property, see section 170(a)(3) and the regulations thereunder.

[T.D. 7202, 37 FR 16920, Aug. 23, 1972, as amended by T.D. 8791, 63 FR 68192, Dec. 10, 1998; T.D. 8926, 66 FR 1038, Jan. 5, 2001; T.D. 9102, 69 FR 20, Jan. 2, 2004]

§ 1.664-4 Calculation of the fair market value of the remainder interest in a charitable remainder unitrust.

- (a) Rules for determining present value. For purposes of sections 170, 2055, 2106, and 2522, the fair market value of a remainder interest in a charitable remainder unitrust (as described in §1.664-3) is its present value determined under paragraph (d) of this section. The present value determined under this section shall be computed on the basis of—
- (1) Life contingencies determined as to each life involved, from the values of lx set forth in Table 90CM contained in §20.2031-7(d)(7) of this chapter in the case of transfers for which the valuation date is after April 30, 1999; or Table 80CNSMT contained $\S20.2031-7A(e)(4)$ of this chapter in the case of transfer for which the valuation date is after April 30, 1989, and before May 1, 1999. See §20.2031-7A(a) through (d) of this chapter, whichever is applicable, for transfers for which the valuation date is before May 1, 1989;
- (2) Interest at the section 7520 rate in the case of transfers for which the valuation date is after April 30, 1989, or 10 percent in the case of transfers to charitable remainder unitrusts made after November 30, 1983, for which the valuation date is before May 1, 1989. See § 20.2031-7A (a) through (c) of this chapter, whichever is applicable, for transfers for which the valuation date is before December 1, 1983; and
- (3) The assumption that the amount described in §1.664–3(a)(1)(i)(a) is distributed in accordance with the payout sequence described in the governing instrument. If the governing instrument does not prescribe when the distribution is made during the period for which the payment is made, for purposes of this section, the distribution is considered payable on the first day of the period for which the payment is made.
- (b) Actuarial Computations by the Internal Revenue Service. The regulations

in this and in related sections provide tables of actuarial factors and examples that illustrate the use of the tables in determining the value of remainder interests in property. Section 1.7520-1(c)(2) refers to government publications that provide additional tables of factors and examples of computations for more complex situations. If the computation requires the use of a factor that is not provided in this section, the Commissioner may supply the factor upon a request for a ruling. A request for a ruling must be accompanied by a recitation of the facts including the date of birth of each measuring life, and copies of the relevant documents. A request for a ruling must comply with the instructions for requesting a ruling published periodically in the Internal Revenue Bulletin (See $\S601.601(d)(2)(ii)(b)$ of this chapter) and include payment of the required user fee. If the Commissioner furnishes the factor, a copy of the letter supplying the factor should be attached to the tax return in which the deduction is claimed. If the Commissioner does not furnish the factor, the taxpayer must furnish a factor computed in accordance with the principles set forth in this section.

- (c) Statement supporting deduction required. Any claim for a deduction on any return for the value of a remainder interest in a charitable remainder unitrust must be supported by a full statement attached to the return showing the computation of the present value of such interest.
- (d) Valuation. The fair market value of a remainder interest in a charitable remainder unitrust (as described in §1.664-3) for transfers for which the valuation date is after April 30, 1999, is its present value determined under paragraph (e) of this section. The fair market value of a remainder interest in a charitable remainder unitrust (as described in §1.664-3) for transfers for which the valuation date is before May 1, 1999, is its present value determined under the following sections:

Valuation dates	Applicable	
After	Before	Applicable Regulations
12–31–51 12–31–70	01-01-71	1.664–4A(a) 1.664–4A(b) 1.664–4A(c)

Valuation dates	Applicable Regulations	
After	Before	Regulations
11–30–83 04–30–89	05–01–89 05–01–99	1.664-4A(d) 1.664-4A(e)

(e) Valuation of charitable remainder unitrusts having certain payout sequences for transfers for which the valuation date is after April 30, 1999—(1) In general. Except as otherwise provided in paragraph (e)(2) of this section, in the case of transfers for which the valuation date is after April 30, 1999, the present value of a remainder interest is determined under paragraphs (e)(3) through (e)(7) of this section, provided that the amount of the payout as of any payout date during any taxable year of the trust is not larger than the amount that the trust could distribute on such date under §1.664-3(a)(1)(v) if the taxable year of the trust were to end on such date. See, however, §1.7520-3(b) (relating to exceptions to the use of the prescribed tables under certain circumstances).

(2) Transitional rules for valuation of charitable remainder unitrusts. (i) For purposes of sections 2055, 2106, or 2624, if on May 1, 1999, the decedent was mentally incompetent so that the disposition of the property could not be changed, and the decedent died after April 30, 1999, without having regained competency to dispose of the decedent's property, or the decedent died within 90 days of the date that the decedent first regained competency after April 30, 1999, the present value of a remainder interest under this section is determined as if the valuation date with respect to the decedent's gross estate is either before May 1, 1999, or after April 30, 1999, at the option of the decedent's executor.

(ii) For purposes of sections 170, 2055, 2106, 2522, or 2624, in the case of transfers to a charitable remainder unitrust for which the valuation date is after April 30, 1999, and before July 1, 1999, the present value of a remainder interest based on one or more measuring lives is determined under this section by use of the section 7520 interest rate for the month in which the valuation date occurs (see §§1.7520–1(b) and 1.7520–2(a)(2)) and the appropriate actuarial tables under either paragraph (e)(7) of this section or §1.664–4A(e)(6), at the

option of the donor or the decedent's executor, as the case may be.

(iii) For purposes of paragraphs (e)(2)(i) and (ii) of this section, where the donor or decedent's executor is given the option to use the appropriate actuarial tables under either paragraph (e)(7) of this section or \$1.664-4A(e)(6). the donor or decedent's executor must use the same actuarial table with respect to each individual transaction and with respect to all transfers occurring on the valuation date (for example, gift and income tax charitable deductions with respect to the same transfer must be determined based on the same tables, and all assets includible in the gross estate and/or estate tax deductions claimed must be valued based on the same tables).

(3) Adjusted payout rate. For transfers for which the valuation date is after April 30, 1989, the adjusted payout rate is determined by using the appropriate Table F in paragraph (e)(6) of this section, for the section 7520 interest rate applicable to the transfer. If the interest rate is between 4.2 and 14 percent, see paragraph (e)(6) of this section. If the interest rate is below 4.2 percent or greater than 14 percent, see paragraph (b) of this section. The adjusted payout rate is determined by multiplying the fixed percentage described in §1.664-3(a)(1)(i)(a) by the factor describing the payout sequence of the trust and the number of months by which the valuation date for the first full taxable year of the trust precedes the first payout date for such taxable year. If the governing instrument does not prescribe when the distribution or distributions shall be made during the taxable year of the trust, see paragraph (a) of this section. In the case of a trust having a payout sequence for which no figures have been provided by the appropriate table, and in the case of a trust that determines the fair market value of the trust assets by taking the average of valuations on more than one date during the taxable year, see paragraph (b) of this section.

(4) Period is a term of years. If the period described in §1.664-3(a)(5) is a term of years, the factor that is used in determining the present value of the remainder interest for transfers for

which the valuation date is after November 30, 1983, is the factor under the appropriate adjusted payout rate in Table D of paragraph (e)(6) of this section corresponding to the number of years in the term. If the adjusted payout rate is an amount that is between adjusted payout rates for which factors are provided in Table D, a linear interpolation must be made. The present value of the remainder interest is determined by multiplying the net fair market value (as of the appropriate valuation date) of the property placed in trust by the factor determined under this paragraph. For purposes of this section, the valuation date is, in the case of an inter vivos transfer, the date on which the property is transferred to the trust by the donor. However, if an election is made under section 7520 and §1.7520-2(b) to compute the present value of the charitable interest by use of the interest rate component for either of the 2 months preceding the month in which the date of transfer falls, the month so elected is the valuation date for purposes of determining the interest rate and mortality tables. In the case of a testamentary transfer under section 2055, 2106, or 2624, the valuation date is the date of death, unless the alternate valuation date is elected under section 2032, in which event, and within the limitations set forth in section 2032 and the regulations thereunder, the valuation date is the alternate valuation date. If the decedent's estate elects the alternate valuation date under section 2032 and also elects, under section 7520 and §1.7520-2(b), to use the interest rate component for one of the 2 months preceding the alternate valuation date, the month so elected is the valuation date for purposes of determining the interest rate and mortality tables. The application of this paragraph (e)(4) may be illustrated by the following example:

Example. D transfers \$100,000 to a charitable remainder unitrust on January 1. The trust instrument requires that the trust pay 8 percent of the fair market value of the trust assets as of January 1st for a term of 12 years to D in quarterly payments (March 31, June 30, September 30, and December 31). The section 7520 rate for January (the month that the transfer occurred) is 9.6 percent. Under Table F(9.6) in paragraph(e)(6) of this

section, the appropriate adjustment factor is .944628 for quarterly payments payable at the end of each quarter. The adjusted payout rate is 7.557 (8%× .944628). Based on the remainder factors in Table D in paragraph(e)(6) of this section, the present value of the remainder interest is \$38,950.30, computed as follows:

Interpolation adjustment:

$$\frac{7.557\% - 7.4\%}{0.2\%} = \frac{x}{.010181}$$

$$x = .007992$$

 Factor at 7.4 percent for 12 years
 .397495

 Less: Interpolation adjustment
 .007992

 Interpolated factor
 .389503

Present value of remainder interest:

(\$100,000×.389503).....\$38,950.30

(5) Period is the life of one individual. If the period described in §1.664-3(a)(5) is the life of one individual, the factor that is used in determining the present value of the remainder interest for transfers for which the valuation date is after April 30, 1999, is the factor in Table U(1) in paragraph (e)(7) of this section under the appropriate adjusted payout. For purposes of the computations described in this paragraph, the age of an individual is the age of that individual at the individual's nearest birthday. If the adjusted payout rate is an amount that is between adjusted payout rates for which factors are provided in the appropriate table, a linear interpolation must be made. The present value of the remainder interest is determined by multiplying the net fair market value (as of the valuation date as determined in paragraph (e)(4) of this section) of the property placed in trust by the factor determined under this paragraph (e)(5). If the adjusted payout rate is between 4.2 and 14 percent, see paragraph (e)(7) of this section. If the adjusted payout rate is below 4.2 percent or greater than 14 percent, see paragraph (b) of this section. The application of this paragraph (e)(5) may be illustrated by the following example:

Example. A, who is 44 years and 11 months old, transfers \$100,000 to a charitable remainder unitrust on January 1st. The trust instrument requires that the trust pay to A semiannually (on June 30 and December 31) 9 percent of the fair market value of the trust assets as of January 1st during A's life. The section 7520 rate for January is 9.6 percent. Under Table F(9.6) in paragraph (e)(6) of this section, the appropriate adjustment factor is .933805 for semiannual payments payable at the end of the semiannual period. The adjusted payout rate is 8.404 (9% X .933805). Based on the remainder factors in Table U(1) in paragraph (e)(7) of this section, the present value of the remainder interest is \$10,109.00, computed as follows:

Factor at 8.4 percent at age 45Factor at 8.6 percent at age 45	.10117 .09715
Difference	.00402

Interpolation adjustment:

$$\frac{8.404\% - 8.4\%}{0.2\%} = \frac{x}{.00402}$$

x = .00008

Factor at 8.4 percent at age 45 Less: Interpolation adjustment	.10117 .00008
Interpolated Factor	.10109

 $Present\ value\ of\ remainder\ interest:$

(\$100,000×.10109)......\$10,109.00

(6) Actuarial Table D and F (4.2) through 14.0) for transfers for which the valuation date is after April 30, 1989. For transfers for which the valuation date is after April 30, 1989, the present value of a charitable remainder unitrust interest that is dependent upon a term of years is determined by using the section 7520 rate and the tables in this paragraph (e)(6). For transfers for which the valuation date is after April 30, 1999, where the present value of a charitable remainder unitrust interest is dependent on the termination of a life interest, see paragraph (e)(5) of this section. See, however, §1.7520-3(b) (relating to exceptions to the use of prescribed tables under certain circumstances). Many actuarial factors not contained in the following tables are contained in Internal Revenue Service Publication 1458, "Actuarial Values, Book Beth," (1999). A copy of this publication is available for purchase from the Superintendent of Documents, United States Government Printing Office, Washington, DC 20402.

Table D—Showing the Present Worth of a Remainder Interest Postponed for a Term Certain in a Charitable Remainder Unitrust

Veere					Adjusted pa	ayout rate				
Years	4.2%	4.4%	4.6%	4.8%	5.0%	5.2%	5.4%	5.6%	5.8%	6.0%
1	.958000	.956000	.954000	.952000	.950000	.948000	.946000	.944000	.942000	.940000
2	.917764	.913936	.910116	.906304	.902500	.898704	.894916	.891136	.887364	.883600
3	.879218	.873723	.868251	.862801	.857375	.851971	.846591	.841232	.835897	.830584
4	.842291	.835279	.828311	.821387	.814506	.807669	.800875	.794123	.787415	.780749
5	.806915	.798527	.790209	.781960	.773781	.765670	.757627	.749652	.741745	.733904
6	.773024	.763392	.753859	.744426	.735092	.725855	.716716	.707672	.698724	.689870
7	.740557	.729802	.719182	.708694	.698337	.688111	.678013	.668042	.658198	.648478
8	.709454	.697691	.686099	.674677	.663420	.652329	.641400	.630632	.620022	.609569
9	.679657	.666993	.654539	.642292	.630249	.618408	.606765	.595317	.584061	.572995
10	.651111	.637645	.624430	.611462	.598737	.586251	.573999	.561979	.550185	.538615
11	.623764	.609589	.595706	.582112	.568800	.555766	.543003	.530508	.518275	.506298
12	.597566	.582767	.568304	.554170	.540360	.526866	.513681	.500800	.488215	.475920
13	.572469	.557125	.542162	.527570	.513342	.499469	.485942	.472755	.459898	.447365
14	.548425	.532611	.517222	.502247	.487675	.473496	.459701	.446281	.433224	.420523
15	.525391	.509177	.493430	.478139	.463291	.448875	.434878	.421289	.408097	.395292
16	.503325	.486773	.470732	.455188	.440127	.425533	.411394	.397697	.384427	.371574
17	.482185	.465355	.449079	.433339	.418120	.403405	.389179	.375426	.362131	.349280
18	.461933	.444879	.428421	.412539	.397214	.382428	.368163	.354402	.341127	.328323
19	.442532	.425304	.408714	.392737	.377354	.362542	.348282	.334555	.321342	.308624
20	.423946	.406591	.389913	.373886	.358486	.343690	.329475	.315820	.302704	.290106

TABLE D—SHOWING THE PRESENT WORTH OF A REMAINDER INTEREST POSTPONED FOR A TERM CERTAIN IN A CHARITABLE REMAINDER UNITRUST

[Applicable after April 30, 1989]

Years					Adjusted pa	ayout rate				
reals	6.2%	6.4%	6.6%	6.8%	7.0%	7.2%	7.4%	7.6%	7.8%	8.0%
1	.938000	.936000	.934000	.932000	.930000	.928000	.926000	.924000	.922000	.920000
	.879844	.876096	.872356	.868624	.864900	.861184	.857476	.853776	.850084	.846400
	.825294	.820026	.814781	.809558	.804357	.799179	.794023	.788889	.783777	.778688
	.774125	.767544	.761005	.754508	.748052	.741638	.735265	.728933	.722643	.716393
	.726130	.718421	.710779	.703201	.695688	.688240	.680855	.673535	.666277	.659082
	.681110	.672442	.663867	.655383	.646990	.638687	.630472	.622346	.614307	.606355
	.638881	.629406	.620052	.610817	.601701	.592701	.583817	.575048	.566391	.557847
	.599270	.589124	.579129	.569282	.559582	.550027	.540615	.531344	.522213	.513219
	.562115	.551420	.540906	.530571	.520411	.510425	.500609	.490962	.481480	.472161
	.527264	.516129	.505206	.494492	.483982	.473674	.463564	.453649	.443925	.434388
11	.494574	.483097	.471863	.460866	.450104	.439570	.429260	.419171	.409298	.399637
	.463910	.452179	.440720	.429527	.418596	.407921	.397495	.387314	.377373	.367666
	.435148	.423239	.411632	.400320	.389295	.378550	.368081	.357879	.347938	.338253
	.408169	.396152	.384465	.373098	.362044	.351295	.340843	.330680	.320799	.311193
	.382862	.370798	.359090	.347727	.336701	.326002	.315620	.305548	.295777	.286297
	.359125	.347067	.335390	.324082	.313132	.302529	.292264	.282326	.272706	.263394
	.336859	.324855	.313254	.302044	.291213	.280747	.270637	.260870	.251435	.242322
	.315974	.304064	.292579	.281505	.270828	.260533	.250610	.241044	.231823	.222936
	.296383	.284604	.273269	.262363	.251870	.241775	.232065	.222724	.213741	.205101
	.278008	.266389	.255233	.244522	.234239	.224367	.214892	.205797	.197069	.188693

Table D—Showing the Present Worth of a Remainder Interest Postponed for a Term Certain in a Charitable Remainder Unitrust

[Applicable after April 30, 1989]

Years					Adjusted pa	ayout rate				
Teals	8.2%	8.4%	8.6%	8.8%	9.0%	9.2%	9.4%	9.6%	9.8%	10.0%
1	.918000	.916000	.914000	.912000	.910000	.908000	.906000	.904000	.902000	.900000
2	.842724	.839056	.835396	.831744	.828100	.824464	.820836	.817216	.813604	.810000
3	.773621	.768575	.763552	.758551	.753571	.748613	.743677	.738763	.733871	.729000
4	.710184	.704015	.697886	.691798	.685750	.679741	.673772	.667842	.661951	.656100
5	.651949	.644878	.637868	.630920	.624032	.617205	.610437	.603729	.597080	.590490
6	.598489	.590708	.583012	.575399	.567869	.560422	.553056	.545771	.538566	.531441
7	.549413	.541089	.532873	.524764	.516761	.508863	.501069	.493377	.485787	.478297
8	.504361	.495637	.487046	.478585	.470253	.462048	.453968	.446013	.438180	.430467
9	.463003	.454004	.445160	.436469	.427930	.419539	.411295	.403196	.395238	.387420
10	.425037	.415867	.406876	.398060	.389416	.380942	.372634	.364489	.356505	.348678
11	.390184	.380934	.371885	.363031	.354369	.345895	.337606	.329498	.321567	.313811
12	.358189	.348936	.339902	.331084	.322475	.314073	.305871	.297866	.290054	.282430
13	.328817	.319625	.310671	.301949	.293453	.285178	.277119	.269271	.261628	.254187
14	.301854	.292777	.283953	.275377	.267042	.258942	.251070	.243421	.235989	.228768
15	.277102	.268184	.259533	.251144	.243008	.235119	.227469	.220053	.212862	.205891
16	.254380	.245656	.237213	.229043	.221137	.213488	.206087	.198928	.192001	.185302
17	.233521	.225021	.216813	.208887	.201235	.193847	.186715	.179830	.173185	.166772
18	.214372	.206119	.198167	.190505	.183124	.176013	.169164	.162567	.156213	.150095
19	.196794	.188805	.181125	.173741	.166643	.159820	.153262	.146960	.140904	.135085
20	.180657	.172946	.165548	.158452	.151645	.145117	.138856	.132852	.127096	.121577

Table D—Showing the Present Worth of a Remainder Interest Postponed for a Term Certain in a Charitable Remainder Unitrust

Years	Adjusted payout rate										
rears	10.2%	10.4%	10.6%	10.8%	11.0%	11.2%	11.4%	11.6%	11.8%	12.0%	
1	.898000	.896000	.894000	.892000	.890000	.888000	.886000	.884000	.882000	.880000	
2	.806404	.802816	.799236	.795664	.792100	.788544	.784996	.781456	.777924	.774400	
3	.724151	.719323	.714517	.709732	.704969	.700227	.695506	.690807	.686129	.681472	
4	.650287	.644514	.638778	.633081	.627422	.621802	.616219	.610673	.605166	.599695	
5	.583958	.577484	.571068	.564708	.558406	.552160	.545970	.539835	.533756	.527732	
6	.524394	.517426	.510535	.503720	.496981	.490318	.483729	.477214	.470773	.464404	
7	.470906	.463613	.456418	.449318	.442313	.435402	.428584	.421858	.415222	.408676	
8	.422874	.415398	.408038	.400792	.393659	.386637	.379726	.372922	.366226	.359635	

Table D—Showing the Present Worth of a Remainder Interest Postponed for a Term Certain in a Charitable Remainder Unitrust—Continued

[Applicable after April 30, 1989]

Years	Adjusted payout rate									
rears	10.2%	10.4%	10.6%	10.8%	11.0%	11.2%	11.4%	11.6%	11.8%	12.0%
9	.379741	.372196	.364786	.357506	.350356	.343334	.336437	.329663	.323011	.316478
	.341007	.333488	.326118	.318896	.311817	.304881	.298083	.291422	.284896	.278501
	.306224	.298805	.291550	.284455	.277517	.270734	.264102	.257617	.251278	.245081
	.274989	.267729	.260645	.253734	.246990	.240412	.233994	.227734	.221627	.215671
	.246941	.239886	.233017	.226331	.219821	.213486	.207319	.201317	.195475	.189791
	.221753	.214937	.208317	.201887	.195641	.189575	.183684	.177964	.172409	.167016
	.199134	.192584	.186236	.180083	.174121	.168343	.162744	.157320	.152065	.146974
	.178822	.172555	.166495	.160634	.154967	.149488	.144191	.139071	.134121	.129337
17	.160582	.154609	.148846	.143286	.137921	.132746	.127754	.122939	.118295	.113817
18	.144203	.138530	.133069	.127811	.122750	.117878	.113190	.108678	.104336	.100159
19	.129494	.124123	.118963	.114007	.109247	.104676	.100286	.096071	.092024	.088140
20	.116286	.111214	.106353	.101694	.097230	.092952	.088853	.084927	.081166	.077563

Table D—Showing the Present Worth of a Remainder Interest Postponed for a Term Certain in a Charitable Remainder Unitrust

Years		Adjusted payout rate									
rears	12.2%	12.4%	12.6%	12.8%	13.0%	13.2%	13.4%	13.6%	13.8%	14.0%	
1	.878000	.876000	.874000	.872000	.870000	.868000	.866000	.864000	.862000	.860000	
2	.770884	.767376	.763876	.760384	.756900	.753424	.749956	.746496	.743044	.739600	
3	.676836	.672221	.667628	.663055	.658503	.653972	.649462	.644973	.640504	.636056	
4	.594262	.588866	.583507	.578184	.572898	.567648	.562434	.557256	.552114	.547008	
5	.521762	.515847	.509985	.504176	.498421	.492718	.487068	.481469	.475923	.470427	
6	.458107	.451882	.445727	.439642	.433626	.427679	.421801	.415990	.410245	.404567	
7	.402218	.395848	.389565	.383368	.377255	.371226	.365279	.359415	.353631	.347928	
8	.353147	.346763	.340480	.334297	.328212	.322224	.316332	.310535	.304830	.299218	
9	.310063	.303764	.297579	.291507	.285544	.279690	.273944	.268302	.262764	.257327	
10	.272236	.266098	.260084	.254194	.248423	.242771	.237235	.231813	.226502	.221302	
11	.239023	.233102	.227314	.221657	.216128	.210725	.205446	.200286	.195245	.190319	
12	.209862	.204197	.198672	.193285	.188032	.182910	.177916	.173047	.168301	.163675	
13	.184259	.178877	.173640	.168544	.163588	.158766	.154075	.149513	.145076	.140760	
14	.161779	.156696	.151761	.146971	.142321	.137809	.133429	.129179	.125055	.121054	
15	.142042	.137266	.132639	.128158	.123819	.119618	.115550	.111611	.107798	.104106	
16	.124713	.120245	.115927	.111754	.107723	.103828	.100066	.096432	.092922	.089531	
17	.109498	.105334	.101320	.097450	.093719	.090123	.086657	.083317	.080098	.076997	
18	.096139	.092273	.088554	.084976	.081535	.078227	.075045	.071986	.069045	.066217	
19	.084410	.080831	.077396	.074099	.070936	.067901	.064989	.062196	.059517	.056947	
20	.074112	.070808	.067644	.064614	.061714	.058938	.056280	.053737	.051303	.048974	

Table F(4.2)—With Interest at 4.2 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations [Applicable after April 30, 1989]

	1 y which the valuation I taxable year of the	2 Factors for payout at the end of each period							
trust precedes	the first payout	Annual period	Semiannual period	Quarterly period	Monthly period				
At least	But less than	Annual period	Semiannual period	Quarterly period	Monthly period				
1 2 3 4 5 6 7 8 9 10 11	1 2 3 4 5 6 7 8 9 10 11 12	1.000000 .996577 .993166 .989767 .986380 .983004 .979639 .976286 .972945 .969615 .966296 .962989	.989820 .986432 .983056 .979691 .976338 .972996 .969666	.984755 .981385 .978026 .974679	.981389 .978030				

Table F(4.4)—With Interest at 4.4 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

[Applicable after April 30, 1989]

1 Number of months by which the valuation date for the first full taxable year of the		2 Factors for payout at the end of each period						
trust precedes the first payout		Annual period	Semiannual period	Quarterly period	Monthly period			
At least	But less than	Annuai period Semiannuai period		Quarterly period	Monthly period			
1 2 3 4 5 6 7 8 9 10 11	1 2 3 4 5 6 7 8 9 10 11 12	1.000000 .996418 .992849 .989293 .985749 .982219 .978700 .975195 .971702 .968221 .964753 .961298	.989350 .985806 .982275 .978757 .975251 .971758 .968277	.984054 .980529 .977017 .973517	.980533 .977021			

Table F(4.6)—With Interest at 4.6 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

[Applicable after April 30, 1989]

1 Number of months by which the valuation date for the first full taxable year of the		2 Factors for payout at the end of each period				
	the first payout	Annual period	Semiannual period	Quarterly period	Monthly period	
At least	But less than	Allitual period	Semiamidai pendu	Quarterly period	Working period	
1 2 3 4 5 6 7 8 9 10 11	1 2 3 4 5 6 7 8 9 10 11 12	1.000000 .996259 .992532 .988820 .985121 .981436 .977764 .974107 .970463 .966832 .963216 .959613	.988882 .985183 .981498 .977826 .974168 .970524 .966894	.983354 .979676 .976011 .972360	.979680 .976015	

Table F(4.8)—With Interest at 4.8 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

1 Number of months by which the valuation date for the first full taxable year of the		2 Factors for payout at the end of each period			
	the first payout	Annual period	Semiannual period	Quarterly period	Monthly period
At least	But less than	Annual period	Semiamuai penou	Quarterly period	Working period
1 2 3 4 5 6 7 8 9 10 11	1 2 3 4 5 6 7 8 9 10 11 12	1.000000 .996101 .992217 .988348 .984494 .980655 .976831 .973022 .969228 .965448 .961684 .957934	.988415 .984561 .980722 .976898 .973089 .969294 .965515	.982657 .978825 .975008 .971206	.978830 .975013

TABLE F(5.0)—WITH INTEREST AT 5.0 PERCENT, SHOWING FACTORS FOR COMPUTATION OF THE ADJUSTED PAYOUT RATE FOR CERTAIN VALUATIONS

[Applicable after April 30, 1989]

1 Number of months by which the valuation date for the first full taxable year of the		2 Factors for payout at the end of each period				
trust precedes	the first payout	Annual period	Semiannual period	Quarterly period	Monthly period	
At least	But less than	Allitual period	Serniannual period	Quarterly period	Working period	
	1	1.000000	.987950	.981961	.977982	
1	2	.995942	.983941	.977977	.974014	
2	3	.991901	.979949	.974009		
3	4	.987877	.975973	.970057		
4	5	.983868	.972013			
5	6	.979876	.968069			
6	7	.975900	.964141			
7	8	.971940				
8	9	.967997				
9	10	.964069				
10	11	.960157				
11	12	.956261				
12		.952381				

Table F(5.2)—With Interest at 5.2 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

[Applicable after April 30, 1989]

1 Number of months by which the valuation date for the first full taxable year of the		2 Factors for payout at the end of each period				
trust precedes		Annual period	Semiannual period	Quarterly period	Monthly period	
At least	But less than	Annual period	Semiamidai penod	Quarterly period	Working period	
	1	1.000000	.987486	.981268	.977137	
1	2	.995784	.983323	.977132	.973018	
2	3	.991587	.979178	.973012		
3	4	.987407	.975050	.968911		
4	5	.983244	.970940			
5	6	.979099	.966847			
6	7	.974972	.962771			
7	8	.970862				
8	9	.966769				
9	10	.962694				
10	11	.958636				
11	12	.954594				
12		.950570				

Table F(5.4)—With Interest at 5.4 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

1 Number of months by which the valuation date for the first full taxable year of the		2 Factors for payout at the end of each period				
	the first payout	Annual period	Semiannual period	Quarterly period	Monthly period	
At least	But less than	Annual period	Germannuar period	Quarterly period	Working period	
1 2 3 4 5 6 7 8 9 10 11	1 2 3 4 5 6 7 8 9 10 11	1.000000 .995627 .991273 .986938 .982622 .978325 .974047 .969787 .965546 .961323 .957119 .952934	.987023 .982707 .978409 .974131 .969871 .965629 .961407	.980577 .976289 .972019 .967769	.976295 .972026	

Table F(5.6)—With Interest at 5.6 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

[Applicable after April 30, 1989]

1 Number of months by which the valuation date for the first full taxable year of the		2 Factors for payout at the end of each period			
	the first payout	Annual period	Semiannual period	Quarterly period	Monthly period
At least	But less than	Allitual period	Semiamidai pendu	Quarterly period	Monthly period
1 2 3 4 5 6 7 8 9 10 11	1 2 3 4 5 6 7 8 9 10 11 12	1.000000 .995470 .990960 .986470 .982001 .977552 .973124 .968715 .964326 .959958 .955609 .951279	.986562 .982092 .977643 .973214 .968805 .964416 .960047	.979888 .975449 .971029 .966630	.975455 .971036

Table F(5.8)—With Interest at 5.8 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

[Applicable after April 30, 1989]

1 Number of months by which the valuation date for the first full taxable year of the		2 Factors for payout at the end of each period				
	the first payout	Annual period	Semiannual period	Quarterly period	Monthly period	
At least	But less than	Annual period	Semiannual penou	Quarterly period	Working period	
	1	1.000000	.986102	.979201	.974618	
1	2	.995313	.981480	.974611	.970050	
2	3	.990647	.976879	.970043		
3	4	.986004	.972300	.965496		
4	5	.981382	.967743			
5	6	.976782	.963206			
6	7	.972203	.958692			
7	8	.967646				
8	9	.963111				
9	10	.958596				
10	11	.954103				
11	12	.949631				
12		.945180				

Table F(6.0)—With Interest at 6.0 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

1 Number of months by which the valuation date for the first full taxable year of the		2 Factors for payout at the end of each period				
	the first payout	Annual period	Semiannual period	Quarterly period	Monthly period	
At least	But less than	Annual period	Germannuar period	Quarterly period	Monthly period	
1 2 3 4 5 6 7 8 9 10 11	1 2 3 4 5 6 7 8 9 10 11	1.000000 .995156 .990336 .985538 .980764 .976014 .971286 .966581 .961899 .957239 .952603 .947988	.985643 .980869 .976117 .971389 .966684 .962001	.978516 .973776 .969059 .964365	.973784 .969067	

Table F(6.2)—With Interest at 6.2 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

[Applicable after April 30, 1989]

1 Number of months by which the valuation date for the first full taxable year of the		2 Factors for payout at the end of each period				
trust precedes	the first payout	Annual period	Semiannual period	Quarterly period	Monthly period	
At least	But less than	Annual period	Semiannual period	Quarterly period	Monthly period	
1 2 3 4 5 6 7 8 9 10 11	1 2 3 4 5 6 7 8 9 10 11	1.00000 .99500 .99500 .990024 .985074 .980148 .975247 .970371 .965519 .960691 .955887 .951107 .946352	.985185 .980259 .975358 .970481 .965628 .960799 .955995	.977833 .972944 .968079 .963238	.972952 .968087	

Table F(6.4)—With Interest at 6.4 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

[Applicable after April 30, 1989]

1 Number of months by which the valuation date for the first full taxable year of the		2 Factors for payout at the end of each period				
trust precedes	the first payout	Annual period	Semiannual period	Quarterly period	Monthly period	
At least	But less than	Allitual period	Semiamidai penod	Quarterly period	Working period	
1 2 3 4 5 6 7 8 9 10 11	1 2 3 4 5 6 7 8 9 10 11	1.000000 .994844 .989714 .984611 .979534 .974483 .969458 .964460 .959487 .954539 .949617 .944721	.984729 .979652 .974600 .969575 .964576 .959602 .954654	.977152 .972114 .967101 .962115	.972122 .967110	

Table F(6.6)—With Interest at 6.6 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

1 Number of months by which the valuation date for the first full taxable year of the		Factors for payout at the end of each period				
	the first payout	Annual period	Semiannual period	Quarterly period	Monthly period	
At least	But less than	Allidai peliod	Germanndar period	Quarterly period	World by period	
1 2 3 4 5 6 7 8 9	1 2 3 4 5 6 7 8 9 10 11	1.000000 .994688 .989404 .984149 .978921 .973721 .968549 .963404 .958286 .953196 .948132 .943096	.984274 .979046 .973845 .968672 .963527 .958408 .953317	.976473 .971286 .966127 .960995	.971295 .966136	

Table F(6.6)—With Interest at 6.6 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations—Continued

[Applicable after April 30, 1989]

1 Number of months by which the valuation date for the first full taxable year of the		F	2 Factors for payout at the	he end of each period	
trust precedes the first payout		Annual period	Semiannual period	Quarterly period	Monthly period
At least	But less than	Annual period	Oemiamidai pendu	Quarterly period	Worlding period
12		.938086			

TABLE F(6.8)—WITH INTEREST AT 6.8 PERCENT, SHOWING FACTORS FOR COMPUTATION OF THE ADJUSTED PAYOUT RATE FOR CERTAIN VALUATIONS

[Applicable after April 30, 1989]

1 Number of months by which the valuation date for the first full taxable year of the		2 Factors for payout at the end of each period				
	the first payout	Annual period	Semiannual period	Quarterly period	Monthly period	
At least	But less than	Annual period	Semiannual penou	Quarterly period	Working period	
	1	1.000000	.983821	.975796	.970471	
1	2	.994533	.978442	.970461	.965165	
2	3	.989095	.973092	.965156		
3	4	.983688	.967772	.959879		
4	5	.978309	.962481			
5	6	.972961	.957219			
6	7	.967641	.951985			
7	8	.962351				
8	9	.957089				
9	10	.951857				
10	11	.946653				
11	12	.941477				
12		.936330				

Table F(7.0)—With Interest at 7.0 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

1 Number of months by which the valuation date for the first full taxable year of the		2 Factors for payout at the end of each period				
trust precedes	trust precedes the first payout		Semiannual period	Quarterly period	Monthly period	
At least	But less than	Annual period	Semiamidai penod	Quarterly period	Working period	
	1	1.000000	.983368	.975122	.969649	
1	2	.994378	.977839	.969639	.964198	
2	3	.988787	.972342	.964187		
3	4	.983228	.966875	.958766		
4	5	.977700	.961439			
5	6	.972203	.956033			
6	7	.966736	.950658			
7	8	.961301				
8	9	.955896				
9	10	.950522				
10	11	.945178				
11	12	.939864				
12		.934579				

Table F(7.2)—With Interest at 7.2 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

[Applicable after April 30, 1989]

1 Number of months by which the valuation date for the first full taxable year of the		2 Factors for payout at the end of each period				
	the first payout	Annual period	Semiannual period	Quarterly period	Monthly period	
At least	But less than	Annual period	Serillarifidat period	Quarterly period	World by period	
1 2 3 4 5 6 7 8 9 10 11 11	1 2 3 4 5 6 7 8 9 10 11	1.000000 .994223 .988479 .982769 .977091 .971446 .965834 .960255 .954707 .949192 .943708 .938256	.982917 .977239 .971593 .965980 .960400 .954851 .949335	.974449 .968819 .963222 .957658	.968830 .963233	

Table F(7.4)—With Interest at 7.4 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

[Applicable after April 30, 1989]

Number of months by which the valuation date for the first full taxable year of the trust precedes the first payout		2 Factors for payout at the end of each period				
		Annual period	Semiannual period	Quarterly period	Monthly period	
At least	But less than	Annual penou	Germannuar periou	Quarterly period	Worlding period	
1 2 3 4 5 6 7 8 9 10 11	1 2 3 4 5 6 7 8 9 10 11	1.000000 .994068 .988172 .982311 .976484 .970692 .964935 .959211 .953521 .947866 .942243 .936654	.982467 .976640 .970847 .965088 .959364 .953673 .948017	.973778 .968002 .962260 .956552	.968013 .962271	

Table F(7.6)—With Interest at 7.6 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

Number of months by which the valuation date for the first full taxable year of the trust precedes the first payout		Factors for payout at the end of each period			
		Annual period	Semiannual period	Quarterly period	Monthly period
At least	But less than	Allidai period	Germannual period	Quarterly period	Working period
1 2 3 4 5 6 7 8 9 10 11	1 2 3 4 5 6 7 8 9 10 11 12	1.000000 .993914 .987866 .981854 .975879 .969940 .964037 .958171 .952340 .946544 .940784 .935058 .929368	.982019 .976042 .970103 .964199 .958331 .952499 .946703	.973109 .967187 .961301 .955451	.967199 .961313

Table F(7.8)—With Interest at 7.8 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

[Applicable after April 30, 1989]

Number of months by which the valuation date for the first full taxable year of the trust precedes the first payout		2 Factors for payout at the end of each period				
		Annual period	Semiannual period	Quarterly period	Monthly period	
At least	But less than	Annual period	Semiannual period	Quarterly period	Widnitily period	
	1	1.0000000	.981571	.972442	.966387	
1	2	.993761	.975447	.966374	.960357	
2	3	.987560	.969361	.960345		
3	4	.981398	.963312	.954353		
4	5	.975275	.957302			
5	6	.969190	.951329			
6	7	.963143	.945393			
7	8	.957133				
8	9	.951161				
9	10	.945227				
10	11	.939329				
11	12	.933468				
12		.927644				

Table F(8.0)—With Interest at 8.0 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

[Applicable after April 30, 1989]

1 Number of months by which the valuation date for the first full taxable year of the		2 Factors for payout at the end of each period			
	the first payout	Annual period	Semiannual period	Quarterly period	Monthly period
At least	But less than	Annual period	Semiamidai penod	Quarterly period	Working period
	1	1.000000	.981125	.971777	.965578
1	2	.993607	.974853	.965564	.959405
2	3	.987255	.968621	.959392	
3	4	980944	.962429	.953258	
4	5	.974673	.956276		
5	6	.968442	.950162		
6	7	.962250	.944088		
7	8	.956099			
8	9	.949987			
9	10	.943913			
10	11	.937879			
11	12	.931883			
12		.925926			

Table F(8.2)—With Interest at 8.2 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

Number of months by which the valuation date for the first full taxable year of the trust precedes the first payout		2 Factors for payout at the end of each period				
		Annual period	Semiannual period	Quarterly period	Monthly period	
At least	But less than	Ailidal pellod	Cernialinual period	Quarterly period	Working period	
1 2 3 4 5 6 7 8 9 10	1 2 3 4 5 6 7 8 9 10 11	1.000000 .993454 .986951 .980490 .974072 .967695 .961361 .955068 .948816 .942605 .936434	.980680 .974261 .967883 .961547 .955253 .949000 .942788	.971114 .964757 .958441 .952167	.964771 .958455	
12		.924214				

Table F(8.2)—With Interest at 8.2 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

[Applicable after April 30, 1989]

1 Number of months by which the valuation date for the first full taxable year of the		2 Factors for payout at the end of each period			
	the first payout	Annual period	Semiannual period	Quarterly period	Monthly period
At least	But less than	Allitual period	Serniannual penou	Quarterly period	Working period
	1	1.000000	.980237	.970453	.963966
1	2	.993301	.973670	.963952	.957509
2	3	.986647	.967148	.957494	
3	4	.980037	.960669	.951080	
4	5	.973472	.954233		
5	6	.966951	.947841		
6	7	.960473	.941491		
7	8	.954039			
8	9	.947648			
9	10	.941300			
10	11	.934994			
11	12	.928731			
12		.922509			

Table F(8.6)—With Interest at 8.6 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

[Applicable after April 30, 1989]

1 Number of months by which the valuation date for the first full taxable year of the trust precedes the first payout		Factors for payout at the end of each period			
		A	Semiannual period	0	Monthly period
At least	But less than	Annual period	Semiamidai pendu	Quarterly period	Worlding period
	1	1.000000	.979794	.969794	.963164
1	2	.993148	.973081	.963149	.956565
2	3	.986344	.966414	.956550	
3	4	.979586	.959793	.949996	
4	5	.972874	.953217		
5	6	.966209	.946686		
6	7	.959589	.940199		
7	8	.953014			
8	9	.946484			
9	10	.940000			
10	11	.933559			
11	12	.927163			
12		.920810			

Table F(8.8)—With Interest at 8.8 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

1 Number of months by which the valuation date for the first full taxable year of the		2 Factors for payout at the end of each period			
trust precedes	the first payout	Annual period	Semiannual period	Quarterly period	Monthly period
At least	But less than	Ailidai peliod	Germannual period	Quarterly period	Widning period
1 2 3 4 5 6 7 8 9 10 11	1 2 3 4 5 6 7 8 9 10 11	1.000000 .992996 .986041 .979135 .972278 .965468 .958706 .951992 .945324 .938703 .932129 .925600 .919118	.979353 .972494 .965683 .958919 .952203 .945534 .938912	.969136 .962349 .955609 .948916	.962364 .955624

Table F(9.0)—With Interest at 9.0 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

[Applicable after April 30, 1989]

Number of months by which the valuation date for the first full taxable year of the trust precedes the first payout		2 Factors for payout at the end of each period			
		Annual period	Semiannual period	Quarterly period	Monthly period
At least	But less than	Allitual period	Serniannual period	Quarterly period	Working period
	1	1.000000	.978913	.968481	.961567
1	2	.992844	.971908	.961551	.954686
2	3	.985740	.964954	.954670	
3	4	.978686	.958049	.947839	
4	5	.971683	.951193		
5	6	.964730	.944387		
6	7	.957826	.937629		
7	8	.950972			
8	9	.944167			
9	10	.937411			
10	11	.930703			
11	12	.924043			
12		.917431			

Table F(9.2)—With Interest at 9.2 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

[Applicable after April 30, 1989]

Number of months by which the valuation date for the first full taxable year of the trust precedes the first payout		2 Factors for payout at the end of each period				
		Annual period	Semiannual period	0 1 1 1 1	Monthly period	
At least	But less than	Annual penou	Semiannual period	Quarterly period	Worlding period	
	1	1.000000	.978474	.967827	.960772	
1	2	.992693	.971324	.960755	.953752	
2	3	.985439	.964226	.953734		
3	4	.978238	.957180	.946765		
4	5	.971089	.950186			
5	6	.963993	.943242			
6	7	.956949	.936350			
7	8	.949956				
8	9	.943014				
9	10	.936123				
10	11	.929283				
11	12	.922492				
12		.915751				

Table F(9.4)—With Interest at 9.4 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain valuations

Number of months by which the valuation date for the first full taxable year of the trust precedes the first payout		2 Factors for payout at the end of each period			
		Annual period	Semiannual period	Quarterly period	Monthly period
At least	But less than	Allitual period	Comamical period	Quarterly period	Monthly period
1 2 3 4 5 6 7 8 9 10 11	1 2 3 4 5 6 7 8 9 10 11 12	1.000000 .992541 .985138 .977790 .970497 .963258 .956074 .948942 .941865 .934839 .927867 .920946	.978037 .970742 .963501 .956315 .949182 .942102 .935075	.967176 .959962 .952802 .945695	.959980 .952820

Table F(9.6)—With Interest at 9.6 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain valuations

[Applicable after April 30, 1989]

Number of months by which the valuation date for the first full taxable year of the trust precedes the first payout		2 Factors for payout at the end of each period				
		Annual period	Semiannual period	Quarterly period	Monthly period	
At least	But less than	Allitual period	Serniannual penou	Quarterly period	Monthly period	
	1	1.000000	.977600	.966526	.959190	
1	2	.992390	.970161	.959171	.951890	
2	3	.984838	.962778	.951872		
3	4	.977344	.955452	.944628		
4	5	.969906	.948181			
5	6	.962526	.940965			
6	7	.955201	.933805			
7	8	.947932				
8	9	.940718				
9	10	.933560				
10	11	.926455				
11	12	.919405				
12		.912409				

Table F(9.8)—With Interest at 9.8 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

[Applicable after April 30, 1989]

1 Number of months by which the valuation date for the first full taxable year of the trust precedes the first payout		2 Factors for payout at the end of each period				
		Annual period	Semiannual period	Quarterly period	Monthly period	
At least	But less than	Annual period	Semiannual penou	Quarterly period	Working period	
	1	1.000000	.977165	.965878	.958402	
1	2	.992239	.969582	.958382	.950964	
2	3	.984539	.962057	.950945		
3	4	.976898	.954591	.943565		
4	5	.969317	.947183			
5	6	.961795	.939832			
6	7	.954331	.932539			
7	8	.946924				
8	9	.939576				
9	10	.932284				
10	11	.925049				
11	12	.917870				
12		.910747				

Table F(10.0)—With Interest at 10.0 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

Number of months by which the valuation date for the first full taxable year of the trust precedes the first payout		2 Factors for payout at the end of each period			
		Annual period	Semiannual period	Quarterly period	Monthly period
At least	But less than	Ariildai period	Commanidat ponda	quariony ponou	months, poned
1 2 3 4 5 6 7 8 9 10 11	1 2 3 4 5 6 7 8 9 10 11	1.000000 .992089 .984240 .976454 .968729 .961066 .953463 .945920 .938436 .931012 .923647 .916340	.976731 .969004 .961338 .953733 .946188 .938703 .931277	.965232 .957596 .950021 .942505	.957616 .950041

Table F(10.2)—With Interest at 10.2 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

[Applicable after April 30, 1989]

Number of months by which the valuation date for the first full taxable year of the trust precedes the first payout		2 Factors for payout at the end of each period				
		Annual period	Semiannual period	Quarterly period	Monthly period	
At least	But less than	Allidai peliod	Germannual period	Quarterly period	Working period	
	1	1.000000	.976298	.964588	.956833	
1	2	.991939	.968428	.956812	.949120	
2	3	.983943	.960622	.949099		
3	4	.976011	.952878	.941448		
4	5	.968143	.945196			
5	6	.960338	.937577			
6	7	.952597	.930019			
7	8	.944918				
8	9	.937301				
9	10	.929745				
10	11	.922250				
11	12	.914816				
12		.907441				

Table F(10.4)—With Interest at 10.4 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

[Applicable after April 30, 1989]

Number of months by which the valuation date for the first full taxable year of the trust precedes the first payout		2 Factors for payout at the end of each period			
		Annual period	Semiannual period	Quarterly period	Monthly period
At least	But less than	7 illiadi period	Comamua ponoa	Quarterly period	Working period
1 2 3 4 5 6 7 8 9	1 2 3 4 5 6 7 8 9 10	1.000000 .991789 .983645 .975568 .967558 .959613 .951734 .943919 .936168 .928481	.975867 .967854 .959907 .952025 .944208 .936455 .928765	.963946 .956031 .948181 .940395	.956052 .948202
11 12	12	.913296 .905797			

Table F(10.6)—With Interest at 10.6 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

Number of months by which the valuation date for the first full taxable year of the trust precedes the first payout		2 Factors for payout at the end of each period			
		Annual period	Semiannual period	Quarterly period	Monthly period
At least	But less than	Ailitual period	Comamical ponce	quarterly period	menuny penea
1 2 3 4 5 6 7 8 9 10 11	1 2 3 4 5 6 7 8 9 10 11 12	1.000000 .991639 .983349 .975127 .966974 .958890 .950873 .942923 .935039 .927222 .919470 .911782	.975436 .967281 .959194 .951174 .943222 .935336 .927516	.963305 .955252 .947265 .939345	.955274 .947287

Table F(10.8)—With Interest at 10.8 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

[Applicable after April 30, 1989]

Number of months by which the valuation date for the first full taxable year of the trust precedes the first payout		2 Factors for payout at the end of each period				
		Annual period	Semiannual period	Quarterly period	Monthly period	
At least	But less than	Allidai peliod	Germannual period	Quarterly period	Working period	
	1	1.000000	.975007	.962667	.954498	
1	2	.991490	.966710	.954475	.946375	
2	3	.983052	.958483	.946352		
3	4	.974687	.950327	.938299		
4	5	.966392	.942239			
5	6	.958168	.934221			
6	7	.950014	.926271			
7	8	.941930				
8	9	.933914				
9	10	.925966				
10	11	.918086				
11	12	.910273				
12		.902527				

Table F(11.0)—With Interest at 11.0 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

[Applicable after April 30, 1989]

Number of months by which the valuation date for the first full taxable year of the trust precedes the first payout		2 Factors for payout at the end of each period				
			Semiannual period	0	Monthly period	
At least	But less than	Annual period	Semiannual penou	Quarterly period	Worlding period	
	1	1.000000	.974579	.962030	.953724	
1	2	.991341	.966140	.953700	.945466	
2	3	.982757	.957774	.945442		
3	4	.974247	.949481	.937255		
4	5	.965811	.941260			
5	6	.957449	.933109			
6	7	.949158	.925029			
7	8	.940939				
8	9	.932792				
9	10	.924715				
10	11	.916708				
11	12	.908770				
12		.900901				

Table F(11.2)—With Interest at 11.2 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

1 Number of months by which the valuation date for the first full taxable year of the		2 Factors for payout at the end of each period				
trust precedes	the first payout	Annual period	Semiannual period	Quarterly period	Monthly period	
At least	But less than	Ailidai peliod	Germannual period	Quarterly period	Working period	
1 2 3 4 5 6 7 8 9 10 11	1 2 3 4 5 6 7 8 9 10 11	1.000000 .991192 .982462 .973809 .965232 .956731 .948304 .939952 .931673 .923467 .915333 .907272	.974152 .965572 .957068 .948638 .940283 .932001 .923792	.961395 .952927 .944534 .936215	.952952 .944559	

TABLE F(11.4)—WITH INTEREST AT 11.4 PERCENT, SHOWING FACTORS FOR COMPUTATION OF THE ADJUSTED PAYOUT RATE FOR CERTAIN VALUATIONS

[Applicable after April 30, 1989]

Number of months by which the valuation date for the first full taxable year of the trust precedes the first payout		2 Factors for payout at the end of each period				
		Annual period	Semiannual period	Quarterly period	Monthly period	
At least	But less than	Allidai peliod	Germannual period	Quarterly period	Working period	
	1	1.000000	.973726	.960762	.952183	
1	2	.991044	.965005	.952157	.943655	
2	3	.982168	.956363	.943630		
3	4	.973372	.947798	.935178		
4	5	.964654	.939309			
5	6	.956015	.930896			
6	7	.947452	.922559			
7	8	.938967				
8	9	.930557				
9	10	.922223				
10	11	.913964				
11	12	.905778				
12		.897666				

Table F(11.6)—With Interest at 11.6 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

[Applicable after April 30, 1989]

Number of months by which the valuation date for the first full taxable year of the		2 Factors for payout at the end of each period				
	the first payout	Annual period Semiannual period Quarterly pe			Monthly period	
At least	But less than	Allitual period	Semiannual penou	Quarterly period	Working period	
	1	1.000000	.973302	.960130	.951416	
1	2	.990896	.964440	.951389	.942754	
2	3	.981874	.955660	.942728		
3	4	.972935	.946959	.934145		
4	5	.964077	.938338			
5	6	.955300	.929795			
6	7	.946603	.921330			
7	8	.937985				
8	9	.929445				
9	10	.920984				
10	11	.912599				
11	12	.904290				
12		.896057				

Table F(11.8)—With Interest at 11.8 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

Number of months by which the valuation date for the first full taxable year of the trust precedes the first payout		2 Factors for payout at the end of each period				
		Annual period	Semiannual period	Quarterly period	Monthly period	
At least	But less than	7 illiaar perioa	Comamical period	Quarterly period	Worlding period	
1 2 3 4 5 6 7 8 9 10 11	1 2 3 4 5 6 7 8 9 10 11	1.000000 .990748 .981582 .972500 .963502 .954588 .945756 .937006 .928337 .919748 .911238 .902807	.972878 .963877 .954959 .946124 .937370 .928698 .920105	.959501 .950624 .941828 .933114	.950651 .941855	

Table F(12.0)—With Interest at 12.0 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

[Applicable after April 30, 1989]

Number of months by which the valuation date for the first full taxable year of the		Pactors for payout at the end of each period				
trust precedes the first payout		Annual period	Semiannual period	Quarterly period	Monthly period	
At least	But less than	Annual period	Semiamuai penou	Quarterly period	Working period	
	1	1.000000	.972456	.958873	.949888	
1	2	.990600	.963315	.949860	.940960	
2	3	.981289	.954260	.940932		
3	4	.972065	.945290	.932087		
4	5	.962928	.936405			
5	6	.953877	.927603			
6	7	.944911	.918884			
7	8	.936029				
8	9	.927231				
9	10	.918515				
10	11	.909882				
11	12	.901329				
12		.892857				

Table F(12.2)—With Interest at 12.2 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

[Applicable after April 30, 1989]

1 Number of months by which the valuation date for the first full taxable year of the		2 Factors for payout at the end of each period				
	the first payout	Annual period Coming and Quarterly period			Monthly period	
At least	But less than	Annual period	Semiannual period	Quarterly period	Monthly period	
1 2 3 4 5 6 7 8 9 10 11	1 2 3 4 5 6 7 8 9 10 11 12	1.000000 .990453 .980997 .971632 .962356 .953168 .944069 .935056 .926129 .917287 .908530 .899856 .891266	.972034 .962754 .953563 .944460 .935443 .926512 .917667	.958247 .949099 .940038 .931063	.949128 .940067	

Table F(12.4)—With Interest at 12.4 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

Number of months by which the valuation date for the first full taxable year of the		2 Factors for payout at the end of each period				
	the first payout	Annual period	Semiannual period	Quarterly period	Monthly period	
At least	But less than	Annual period	Semiamuai penou	Quarterly period	Worthly period	
1 2 3 4 5 6 7 8 9 10	1 2 3 4 5 6 7 8 9 10 11	1.000000 .990306 .980706 .971199 .961785 .952461 .943228 .934085 .925030 .916063 .907183	.971614 .962195 .952868 .943631 .934484 .925425 .916454	.957623 .948340 .939147 .930043	.948370 .939176	

Table F(12.4)—WITH INTEREST AT 12.4 PERCENT, SHOWING FACTORS FOR COMPUTATION OF THE ADJUSTED PAYOUT RATE FOR CERTAIN VALUATIONS—Continued

[Applicable after April 30, 1989]

1 Number of months by which the valuation date for the first full taxable year of the		F	2 Factors for payout at the	ne end of each period	
trust precedes the first payout		Annual period	Semiannual period	Quarterly period	Monthly period
At least	But less than	Annual period Semiannual period C	Quarterly period	Working period	
12		.889680			

TABLE F(12.6)—WITH INTEREST AT 12.4 PERCENT, SHOWING FACTORS FOR COMPUTATION OF THE ADJUSTED PAYOUT RATE FOR CERTAIN VALUATIONS

[Applicable after April 30, 1989]

Number of months by which the valuation date for the first full taxable year of the		2 Factors for payout at the end of each period				
	the first payout	Annual period Semiannual per		Quarterly period	Monthly period	
At least	At least but less than	Allilual pellou	Semiamuai penou	Quarterly period	Working period	
	1	1.000000	.971195	.957000	.947614	
1	2	.990159	.961638	.947583	.938289	
2	3	.980416	.952175	.938258		
3	4	.970768	.942805	.929025		
4	5	.961215	.933527			
5	6	.951756	.924341			
6	7	.942390	.915245			
7	8	.933117				
8	9	.923934				
9	10	.914842				
10	11	.905840				
11	12	.896926				
12		.888099				

Table F(12.8)—With Interest at 12.8 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

Number of months by which the valuation date for the first full taxable year of the		2 Factors for payout at the end of each period				
trust precedes	the first payout	Assessed a serient Commission of Commission		Quarterly period	Monthly period	
At least	but less than	Annual period	Semiannual period	Quarterly period	Working period	
	1	1.000000	.970777	.956379	.946860	
1	2	.990013	.961082	.946828	.937403	
2	3	.980126	.951484	.937372		
3	4	.970337	.941981	.928011		
4	5	.960647	.932574			
5	6	.951053	.923260			
6	7	.941554	.914040			
7	8	.932151				
8	9	.922842				
9	10	.913625				
10	11	.904501				
11	12	.895468				
12		.886525				

Table F(13.0)—With Interest at 13.0 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

[Applicable after April 30, 1989]

1 Number of months by which the valuation date for the first full taxable year of the		$\frac{2}{2}$ Factors for payout at the end of each period				
	the first payout	Annual period	Semiannual period	Quarterly period	Monthly period	
At least	But less than	Allidai peliod	Germannual period	Quarterly period	Working period	
	1	1.000000	.970360	.955760	.946108	
1	2	.989867	.960528	.946075	.936521	
2	3	.979836	.950795	.936489		
3	4	.969908	.941160	.926999		
4	5	.960079	.931623			
5	6	.950351	.922183			
6	7	.940721	.912838			
7	8	.931188				
8	9	.921753				
9	10	.912412				
10	11	.903167				
11	12	.894015				
12		.884956				

Table F(13.2)—With Interest at 13.2 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

[Applicable after April 30, 1989]

Number of months by which the valuation date for the first full taxable year of the trust precedes the first payout		2 Factors for payout at the end of each period				
		Annual period	Semiannual period	Quarterly period	Monthly period	
At least	But less than	7 illiadi period	Comamua ponoa	Quarterly period	Working period	
	1	1.000000	.969945	.955143	.945359	
1	2	.989721	.959975	.945325	.935641	
2	3	.979548	.950107	.935608		
3	4	.969479	.940341	.925991		
4	5	.959514	.930675			
5	6	.949651	.921109			
6	7	.939889	.911641			
7	8	.930228				
8	9	.920667				
9	10	.911203				
10	11	.901837				
11	12	.892567				
12		.883392				

Table F(13.4)—With Interest at 13.4 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

Number of months by which the valuation date for the first full taxable year of the trust precedes the first payout		2 Factors for payout at the end of each period				
		Annual period	Semiannual period	Quarterly period	Monthly period	
At least	But less than	7 illiaar perioa	Comamical period	Quarterly period	Working period	
1 2 3 4 5 6 7 8 9 10 11	1 2 3 4 5 6 7 8 9 10 11 12	1.000000 .989575 .979260 .969051 .958949 .948953 .939060 .929271 .919584 .900998 .900511 .891124	.969530 .959423 .949422 .939524 .929730 .920038 .910447	.954527 .944577 .934730 .924986	.944611 .934764	

Table F(13.6)—With Interest at 13.6 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

[Applicable after April 30, 1989]

Number of months by which the valuation date for the first full taxable year of the trust precedes the first payout		2 Factors for payout at the end of each period				
		Annual period	Semiannual period	Quarterly period	Monthly period	
At least	But less than	Allitual period	Semiannual penou	Quarterly period	Working period	
	1	1.000000	.969117	.953913	.943866	
1	2	.989430	.958873	.943831	.933890	
2	3	.978972	.948738	.933854		
3	4	.968624	.938710	.923984		
4	5	.958386	.928788			
5	6	.948256	.918971			
6	7	.938233	.909257			
7	8	.928316				
8	9	.918504				
9	10	.908796				
10	11	.899190				
11	12	.889686				
12		.880282				

Table F(13.8)—With Interest at 13.8 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

[Applicable after April 30, 1989]

	y which the valuation taxable year of the		Factors for payout at the	ne end of each period	
	the first payout	Annual period	Semiannual period	Quarterly period	Monthly period
At least	But less than	Ailidai peliod	Germannual period	Quarterly period	Worlding period
1 2 3 4 5 6 7 8 9 10 11	1 2 3 4 5 6 7 8 9 10 11	1.000000 .989285 .978685 .968199 .957824 .947561 .937408 .927364 .917428 .907598 .897873 .888252 .878735	.968704 .958325 .948056 .937898 .927849 .917907 .908072	.953301 .943087 .932982 .922985	.943123 .933018

Table F(14.0)—With Interest at 14.0 Percent, Showing Factors for Computation of the Adjusted Payout Rate for Certain Valuations

	1 y which the valuation I taxable year of the		Factors for payout at the end of each period									
	the first payout	Annual period	Semiannual period	Quarterly period	Monthly period							
At least	But less than	Almai penoa	Germannual period	Quarterly period	Monthly period							
1 2 3 4 5 6 7 8 9 10 11	1 2 3 4 5 6 7 8 9 10 11	1.000000 .989140 .978399 .967774 .957264 .946868 .936586 .926415 .916354 .906403 .896560 .886824 .877193	.968293 .957778 .947377 .937088 .926912 .916846 .906889	.952691 .942345 .932111 .921989	.942382 .932148							

(7) Actuarial Table U(1) for transfers for which the valuation date is after April 30, 1999. For transfers for which the valuation date is after April 30, 1999, the present value of a charitable remainder unitrust interest that is dependent on the termination of a life interest is determined by using the section 7520 rate, Table U(1) in this paragraph (e)(7), and Table F(4.2) through (14.0) in paragraph (e)(6) of this section. See, however,

§1.7520–3(b) (relating to exceptions to the use of prescribed tables under certain circumstances). Many actuarial factors not contained in the following tables are contained in Internal Revenue Service Publication 1458, "Actuarial Values, Book Beth," (7–1999). A copy of this publication is available for purchase from the Superintendent of Documents, United States Government Printing Office, Washington, DC 20402.

Table U(1)—Based on Life Table 90CM Unitrust Single Life Remainder Factors Applicable For Transfers After April 30, 1999

[Adjusted pa	ayout rate]
--------------	-------------

Age	4.2%	4.4%	4.6%	4.8%	5.0%	5.2%	5.4%	5.6%	.8%	6.0%
0	.06177	.05580	.05061	.04609	.04215	.03871	.03570	.03307	.03075	.02872
1	.05543	.04925	.04388	.03919	.03509	.03151	.02838	.02563	.02321	.02109
2	.05716	.05081	.04528	.04045	.03622	.03252	.02927	.02642	.02391	.02170
3	.05920	.05268	.04699	.04201	.03765	.03382	.03046	.02750	.02490	.02260
4	.06143	.05475	.04889	.04376	.03926	.03530	.03182	.02876	.02605	.02366
5	.06384	.05697	.05095	.04567	.04103	.03694	.03334	.03016	.02735	.02487
6	.06637	.05933	.05315	.04771	.04292	.03870	.03497	.03168	.02876	.02618
7	.06905	.06183	.05547	.04987	.04494	.04058	.03673	.03332	.03029	.02761
8	.07186	.06445	.05792	.05216	.04708	.04258	.03859	.03506	.03192	.02914
9	.07482	.06722	.06052	.05460	.04936	.04471	.04060	.03694	.03369	.03079
10	.07793	.07015	.06327	.05718	.05179	.04700	.04274	.03896	.03559	.03259
11	.08120	.07323	.06617	.05991	.05435	.04942	.04502	.04111	.03762	.03450
12	.08461	.07645	.06920	.06277	.05706	.05197	.04744	.04339	.03978	.03655
13	.08812	.07976	.07234	.06574	.05985	.05461	.04993	.04576	.04202	.03867
14	.09168	.08313	.07552	.06874	.06269	.05729	.05247	.04815	.04428	.04081
15	.09527	.08652	.07872	.07176	.06554	.05999	.05501	.05055	.04655	.04296
16	.09886	.08991	.08192	.07478	.06839	.06267	.05754	.05294	.04880	.04508
17	.10249	.09334	.08515	.07782	.07126	.06537	.06008	.05533	.05105	.04720
18	.10616	.09680	.08842	.08090	.07415	.06809	.06264	.05774	.05332	.04933
19	.10994	.10037	.09178	.08407	.07714	.07091	.06529	.06023	.05566	.05153
20	.11384	.10406	.09527	.08737	.08025	.07383	.06805	.06283	.05811	.05384
21	.11790	.10790	.09891	.09080	.08349	.07690	.07094	.06555	.06068	.05626
22	.12208	.11188	.10267	.09436	.08686	.08008	.07395	.06839	.06336	.05879
23	.12643	.11601	.10659	.09808	.09038	.08342	.07710	.07138	.06618	.06146
24	.13095	.12031	.11069	.10197	.09408	.08692	.08042	.07452	.06915	.06427
25	.13567	.12481	.11497	.10605	.09795	.09060	.08392	.07784	.07230	.06726
26	.14058	.12950	.11945	.11032	.10202	.09447	.08760	.08134	.07563	.07042
27	.14571	.13442	.12415	.11481	.10631	.09856	.09149	.08505	.07916	.07379
28	.15104	.13953	.12904	.11949	.11078	.10284	.09558	.08895	.08288	.07733
29	.15656	.14484	.13414	.12438	.11546	.10731	.09986	.09304	.08679	.08106
30	.16229	.15034	.13943	.12946	.12034	.11198	.10433	.09732	.09089	.08498
31	.16821	.15605	.14493	.13474	.12541	.11685	.10900	.10179	.09517	.08909
32	.17433	.16196	.15063	.14023	.13069	.12193	.11387	.10647	.09966	.09339
33	.18068	.16810	.15655	.14595	.13620	.12723	.11897	.11137	.10437	.09791
34	.18724	.17446	.16270	.15189	.14193	.13275	.12430	.11650	.10930	.10265
35	.19405	.18107	.16910	.15808	.14791	.13853	.12987	.12187	.11448	.10764
36	.20109	.18791	.17574	.16451	.15414	.14456	.13569	.12749	.11990	.11287
37	.20838	.19500	.18263	.17120	.16062	.15083	.14177	.13337	.12558	.11835
38	.21593	.20236	.18979	.17816	.16739	.15739	.14813	.13953	.13154	.12412
39	.22374	.20998	.19723	.18540	.17443	.16423	.15477	.14597	.13779	.13017
40	.23183	.21789	.20496	.19294	.18177	.17138	.16172	.15272	.14434	.13653
41	.24021	.22611	.21299	.20079	.18943	.17885	.16899	.15980	.15123	.14322
42	.24889	.23463	.22134	.20896	.19741	.18665	.17660	.16721	.15845	.15025
43	.25786	.24344	.23000	.21744	.20572	.19477	.18453	.17496	.16601	.15762
44	.26712	.25257	.23896	.22625	.21435	.20322	.19281	.18305	.17391	.16534
45	.27665	.26196	.24821	.23534	.22328	.21198	.20139	.19145	.18213	.17338
46	.28644	.27163	.25774	.24472	.23251	.22105	.21028	.20018	.19068	.18174
47	.29647	.28155	.26754	.25438	.24201	.23040	.21947	.20919	.19952	.19041
48	.30676	.29173	.27760	.26431	.25181	.24004	.22896	.21852	.20868	.19941
49	.31729	.30217	.28794	.27453	.26190	.24999	.23876	.22817	.21817	.20873
50	.32808	.31289	.29856	.28505	.27229	.26026	.24889	.23814	.22799	.21839
51	.33912	.32387	.30946	.29585	.28299	.27083	.25933	.24845	.23815	.22840
52	.35038	.33507	.32060	.30691	.29395	.28168	.27005	.25904	.24861	.23872

26 CFR Ch. I (4-1-08 Edition)

§ 1.664-4

Age	4.2%	4.4%	4.6%	4.8%	5.0%	5.2%	5.4%	5.6%	.8%	6.0%
53	.36185	.34651	.33198	.31821 .32976	.30517	.29280	.28106	.26993	.25937	.24934
54 55	.37352 .38539	.35815 .37002	.34358 .35542	.32976	.31664 .32836	.30418 .31583	.29234 .30390	.28110 .29256	.27042	.26026 .27149
56	.39746	.38209	.36748	.35358	.34034	.32774	.31574	.30431	.29342	.28303
57	.40971	.39437	.37976	.36584	.35257	.33992	.32785	.31634	.30536	.29488
58	.42212	.40682	.39222	.37829	.36500	.35231	.34019	.32862	.31756	.30699
59	.43464	.41939	.40482	.39090	.37759	.36488	.35272	.34109	.32996	.31932
60	.44726 .45999	.43207 .44488	.41754 .43041	.40364 .41655	.39034 .40326	.37761 .39053	.36542	.35375 .36662	.34257 .35540	.33186 .34463
62	.47286	.45785	.44345	.42964	.41639	.40367	.37833 .39146	.37974	.36848	.35767
63	.48589	.47098	.45667	.44293	.42972	.41703	.40484	.39311	.38184	.37100
64	.49903	.48426	.47005	.45638	.44324	.43060	.41843	.40671	.39544	.38458
65	.51229	.49766	.48357	.47001	.45694	.44435	.43223	.42054	.40927	.39841
66	.52568	.51121	.49726	.48381	.47084	.45833	.44626	.43461	.42337	.41252
67 68	.53924 .55293	.52495 .53883	.51115 .52521	.49784 .51205	.48498 .49932	.47256 .48701	.46056 .47511	.44898 .46360	.43778 .45246	.42696 .44169
69	.56671	.55283	.53940	.52640	.51382	.50165	.48985	.47844	.46738	.45666
70	.58052	.56687	.55365	.54084	.52843	.51639	.50473	.49342	.48245	.47181
71	.59431	.58091	.56791	.55529	.54306	.53118	.51966	.50847	.49761	.48707
72	.60804	.59490	.58213	.56973	.55768	.54598	.53461	.52357	.51283	.50239
73	.62168	.60881	.59629	.58411	.57227	.56076	.54955	.53866	.52806	.51774 .53316
74 75	.63528 .64887	.62268 .63657	.61042 .62458	.59848 .61290	.58686 .60151	.57555 .59041	.56453 .57959	.55380 .56904	.54335 .55875	.54872
76	.66249	.65049	.63880	.62739	.61625	.60538	.59478	.58443	.57432	.56446
77	.67612	.66446	.65307	.64194	.63108	.62046	.61009	.59995	.59005	.58037
78	.68975	.67843	.66736	.65654	.64596	.63561	.62548	.61558	.60590	.59643
79	.70330	.69233	.68160	.67109	.66081	.65074	.64088	.63123	.62178	.61253
80	.71666	.70605	.69566	.68548	.67550	.66573	.65615	.64676	.63755	.62853
81 82	.72975 .74250	.71950 .73263	.70946 .72293	.69961 .71342	.68995 .70407	.68047 .69490	.67117 .68589	.66205 .67705	.65310 .66837	.64433 .65984
83	.75493	.74542	.73608	.72690	.71788	.70902	.70031	.69175	.68333	.67506
84	.76712	.75798	.74900	.74016	.73147	.72292	.71451	.70624	.69810	.69010
85	.77913	.77037	.76175	.75326	.74491	.73668	.72859	.72061	.71276	.70503
86	.79086	.78248	.77423	.76610	.75808	.75019	.74241	.73474	.72719	.71974
87 88	.80218 .81307	.79418 .80544	.78628 .79790	.77850 .79047	.77083 .78313	.76326 .77589	.75580 .76874	.74844 .76169	.74118 .75473	.73402 .74786
89	.82355	.81628	.80909	.80200	.79500	.78808	.78125	.77450	.76783	.76125
90	.83360	.82668	.81985	.81309	.80642	.79982	.79330	.78685	.78048	.77418
91	.84308	.83650	.83000	.82357	.81721	.81092	.80470	.79855	.79246	.78645
92	.85182	.84556	.83937	.83325	.82718	.82119	.81525	.80937	.80356	.79780
93	.85985	.85390	.84800	.84215	.83637	.83064	.82497	.81936	.81379	.80829
94 95	.86732 .87437	.86164 .86895	.85601 .86359	.85044 .85827	.84491 .85300	.83944 .84778	.83402 .84260	.82865 .83746	.82333 .83237	.81806 .82733
96	.88097	.87582	.87070	.86563	.86060	.85561	.85066	.84575	.84088	.83605
97	.88708	.88216	.87727	.87243	.86762	.86285	.85811	.85341	.84875	.84413
98	.89280	.88810	.88343	.87880	.87420	.86964	.86511	.86061	.85614	.85171
99	.89836	.89388	.88943	.88501	.88062	.87626	.87193	.86763	.86336	.85911
100	.90375	.89948	.89525	.89103	.88685	.88269	.87856	.87445	.87037	.86632
101	.90905 .91424	.90500 .91040	.90097 .90658	.89696 .90278	.89298 .89900	.88902 .89524	.88509 .89150	.88118 .88778	.87729 .88408	.87342 .88040
103	.91939	.91575	.91214	.90854	.90496	.90139	.89785	.89432	.89081	.88732
104	.92485	.92144	.91805	.91467	.91131	.90796	.90463	.90131	.89800	.89471
105	.93020	.92701	.92383	.92067	.91751	.91437	.91125	.90813	.90502	.90193
106	.93701	.93411	.93122	.92834	.92546	.92260	.91974	.91689	.91405	.91122
107	.94522 .95782	.94268 .95583	.94013 .95385	.93760 .95187	.93507 .94989	.93254 .94791	.93002 .94593	.92750 .94396	.92499 .94199	.92249 .94002
109	.97900	.97800	.97700	.97600	.97500		.97300	.97200	.97100	
								. ===		
Age	6.2%	6.4%	6.6%	6.8%	7.0%	7.2%	7.4%	7.6%	7.8%	8.0%
0	.02693	.02534	.02395	.02271	.02161	.02063	.01976	.01898	.01828	.01765
1	.01922	.01756	.01610	.01480	.01365	.01263	.01171	.01090	.01020	.00951
2	.01975	.01802	.01650	.01514	.01393	.01286	.01190	.01104	.01028	.00959
3	.02056	.01876	.01717	.01575	.01449	.01336	.01235	.01145	.01064	.00992
4	.02155	.01967	.01800	.01652	.01520	.01401	.01296	.01201	.01116	.01039
5 6	.02266	.02071	.01896	.01741	.01603	.01479	.01368	.01269	.01179	.01098
7	.02389 .02522	.02184	.02003 .02120	.01841 .01950	.01696 .01799	.01566 .01663	.01450 .01540	.01345 .01431	.01251 .01332	.01166 .01242
8	.02665	.02309	.02120	.02069	.01910	.01768	.01640	.01524	.01332	.01242
9	.02821	.02590	.02384	.02199	.02033	.01884	.01750	.01629	.01520	.01421
10	.02990	.02750	.02535	.02342	.02169	.02013	.01872	.01745	.01631	.01526
11	.03172	.02922	.02698	.02497	.02316	.02153	.02006	.01872	.01752	.01643
12 13	.03365	.03106	.02872 .03054	.02663	.02474	.02303	.02149	.02010 .02154	.01884	.01769
10	.03566	.03297	.03034	.02835	.02638	.02460	.02299	.02134	.02021	.01901

_		0.551		0.551	0.551	-	-		-	-	
_	Age	6.2%	6.4%	6.6%	6.8%	7.0%	7.2%	7.4%	7.6%	7.8%	8.0%
14		.03770	.03490	.03237	.03010	.02804	.02619	.02450	.02298	.02159	.02033
		.03973	.03682	.03419	.03182	.02968	.02775	.02599	.02439	.02294	.02162
		.04173	.03871	.03598	.03352	.03129	.02926	.02743	.02576	.02424	.02286
		.04372	.04059	.03775	.03519	.03287	.03076	.02884	.02710	.02551	.02406
		.04573 .04780	.04248	.03953 .04137	.03686 .03859	.03444 .03607	.03224	.03024 .03169	.02842 .02978	.02676 .02804	.02524 .02646
		.04997	.04647	.04329	.04040	.03778	.03539	.03321	.03122	.02940	.02773
		.05226	.04862	.04532	.04232	.03958	.03709	.03481	.03274	.03083	.02909
22		.05465	.05088	.04745	.04432	.04148	.03888	.03650	.03433	.03234	.03052
		.05716	.05325	.04969	.04645	.04348	.04077	.03830	.03603	.03394	.03203
		.05983	.05578	.05208	.04871	.04562	.04280	.04021	.03784	.03566	.03367
		.06266 .06566	.05846	.05463 .05734	.05112 .05369	.04791 .05035	.04497 .04729	.04227 .04448	.03980 .04189	.03752 .03951	.03543
		.06887	.06131 .06436	.06024	.05646	.05298	.04729	.04446	.04169	.03931	.03732
		.07225	.06758	.06331	.05938	.05577	.05245	.04940	.04658	.04398	.04159
		.07581	.07099	.06656	.06248	.05873	.05528	.05210	.04916	.04645	.04394
		.07956	.07457	.06998	.06575	.06186	.05827	.05495	.05189	.04906	.04644
		.08348	.07833	.07358	.06920	.06515	.06142	.05797	.05478	.05182	.04908
		.08761	.08228	.07736	.07282	.06863	.06475	.06116	.05783	.05475	.05189
		.09195	.08645	.08136	.07666	.07231	.06828	.06454	.06108	.05786	.05488
		.09651	.09082 .09545	.08557 .09002	.08070 .08498	.07619 .08030	.07200 .07596	.06812 .07193	.06452 .06818	.06117	.05805
		.10635	.10031	.09470	.08949	.08465	.08015	.07596	.07206	.06842	.06503
		.11165	.10542	.09963	.09424	.08923	.08457	.08022	.07617	.07238	.06885
38		.11722	.11081	.10484	.09927	.09409	.08926	.08475	.08054	.07661	.07293
		.12308	.11648	.11032	.10458	.09922	.09422	.08955	.08518	.08109	.07726
		.12925	.12246	.11612	.11020	.10466	.09949	.09465	.09011	.08587	.08189
		.13575 .14259	.12877 .13542	.12225 .12871	.11614 .12243	.11043 .11654	.10508 .11101	.10007 .10583	.09537 .10097	.09097 .09640	.08683
		.14977	.14242	.13552	.12905	.12298	.11729	.11193	.10690	.10217	.09771
		.15731	.14976	.14269	.13604	.12979	.12391	.11838	.11318	.10828	.10367
45		.16516	.15743	.15017	.14334	.13691	.13086	.12516	.11979	.11472	.10994
		.17334	.16544	.15800	.15099	.14438	.13816	.13228	.12674	.12150	.11656
		.18184	.17375	.16613	.15895	.15217	.14576	.13972	.13400	.12860	.12349
		.19066 .19981	.18240 .19138	.17461 .18342	.16724 .17588	.16029 .16875	.15371 .16201	.14749 .15562	.14161 .14956	.13604	.13077
		.20931	.20072	.19259	.18489	.17759	.17067	.16412	.15790	.15199	.14639
		.21917	.21042	.20212	.19426	.18679	.17971	.17299	.16660	.16054	.15477
		.22933	.22043	.21198	.20395	.19633	.18909	.18220	.17566	.16943	.16350
		.23981	.23076	.22216	.21399	.20621	.19881	.19176	.18506	.17867	.17258
		.25060	.24141	.23267	.22434	.21642	.20886	.20166	.19480	.18826	.18201
		.26171 .27313	.25239 .26369	.24351 .25468	.23504 .24608	.22697 .23787	.21927 .23003	.21192 .22254	.20491 .21538	.19821 .20854	.19182
		.28487	.27531	.26618	.25746	.24912	.24114	.23351	.22621	.21923	.21254
		.29688	.28722	.27798	.26914	.26067	.25257	.24481	.23738	.23025	.22343
		.30913	.29937	.29002	.28107	.27249	.26427	.25639	.24882	.24157	.23461
60		.32159	.31175	.30231	.29325	.28457	.27623	.26823	.26055	.25317	.24608
		.33429	.32437	.31485	.30571	.29692	.28848	.28037	.27257	.26507	.25786
		.34728	.33730	.32770	.31847	.30960	.30106	.29285	.28495	.27734	.27001
		.36057 .37412	.35053 .36404	.34087 .35433	.33157 .34498	.32262 .33596	.31400 .32726	.30569 .31887	.29769 .31078	.28998 .30298	.28255
		.38794	.37783	.36809	.35868	.34961	.34085	.33239	.32422	.31633	.30871
		.40205	.39193	.38216	.37272	.36361	.35479	.34628	.33804	.33008	.32238
		.41650	.40639	.39661	.38715	.37800	.36915	.36059	.35230	.34428	.33651
		.43126	.42117	.41139	.40193	.39277	.38390	.37530	.36697	.35890	.35108
		.44628	.43622	.42648	.41703	.40787	.39898	.39037	.38201	.37391	.36604
		.46150 .47683	.45149 .46689	.44178 .45723	.43236 .44785	.42321 .43873	.41433 .42987	.40571 .42126	.39735 .41290	.38922 .40476	.38132
		.49225	.48238	.47279	.46346	.45439	.44556	.43697	.42862	.42048	.41257
		.50770	.49793	.48841	.47915	.47013	.46135	.45280	.44447	.43635	.42844
		.52324	.51358	.50416	.49498	.48603	.47731	.46880	.46051	.45242	.44454
75		.53894	.52939	.52008	.51100	.50214	.49349	.48505	.47681	.46877	.46092
		.55483	.54543	.53624	.52728	.51852	.50996	.50160	.49344	.48546	.47766
		.57091	.56167	.55263	.54380	.53516	.52671	.51845	.51038	.50247	.49475
		.58716 .60346	.57809	.56922 .58590	.56053 .57738	.55203 .56904	.54372 .56086	.53557	.52760	.51980 .53732	.51216 .52978
		.61969	.59459 .61102	.60252	.59419	.58601	.57800	.55286 .57014	.54501 .56243	.55487	.54745
		.63571	.62726	.61897	.61082	.60283	.59499	.58729	.57974	.57232	.56503
		.65146	.64324	.63515	.62722	.61942	.61176	.60423	.59683	.58957	.58242
		.66693	.65893	.65108	.64335	.63575	.62828	.62093	.61371	.60660	.59962
		.68222	.67447	.66684	.65934	.65195	.64468	.63753	.63049	.62356	.61674
		.69742	.68993	.68255	.67528	.66812	.66106	.65411	.64727 .66390	.64053 .65736	.63389
		.71241 .72696	.70517 .72000	.69805 .71313	.69102 .70635	.68410 .69967	.67727 .69307	.67054 .68656	.68014		.65091 .66756
01		2000	2000			.00001	00001		.00014	0.001	557.50

26 CFR Ch. I (4-1-08 Edition)

§ 1.664-4

Λαο	6 20/	6 49/	6 69/	6 00/	7.09/	7 20/	7 40/	7.69/	7 00/	9.09/
Age	6.2%	6.4%	6.6%	6.8%	7.0%	7.2%	7.4%	7.6%	7.8%	8.0%
88	.74108	.73438	.72777	.72125	.71480	.70845	.70217	.69597	.68985	.68380
89	.75475	.74832	.74198	.73571	.72951	.72339	.71734	.71137	.70547	.69963
90	.76796	.76180	.75572	.74971	.74376	.73788	.73207	.72633	.72065	.71503
91	.78049	.77460	.76878	.76302	.75732	.75168	.74610	.74058	.73512	.72972
92	.79211	.78647	.78089	.77537	.76990	.76449	.75913	.75383	.74858	.74338
93	.80283	.79743	.79208	.78679	.78154	.77634	.77119	.76610	.76105	.75604
94	.81283	.80765	.80253	.79744	.79240	.78741	.78247	.77756	.77270	.76789
95	.82233	.81737	.81245	.80757	.80274	.79795	.79320	.78849	.78382	.77918
96	.83126	.82651	.82180	.81712	.81248	.80788	.80332	.79880	.79431	.78985
97	.83953	.83498	.83046	.82597	.82152	.81710	.81271	.80836	.80404	.79976
98	.84731 .85490	.84294	.83860 .84656	.83429 .84243	.83002 .83832	.82577	.82155 .83020	.81737 .82618	.81321 .82219	.80908 .81822
100	.86229	.85071 .85828	.85431	.85035	.84642	.83425 .84252	.83864	.83478	.83095	.82714
101	.86958	.86575	.86195	.85818	.85442	.85069	.84698	.84329	.83962	.83597
102	.87674	.87310	.86947	.86587	.86229	.85873	.85518	.85166	.84815	.84466
103	.88384	.88038	.87694	.87351	.87010	.86671	.86334	.85998	.85663	.85331
104	.89143	.88817	.88492	.88169	.87847	.87526	.87207	.86889	.86573	.86258
105	.89885	.89578	.89272	.88967	.88664	.88361	.88060	.87760	.87461	.87163
106	.90840	.90559	.90278	.89999	.89720	.89442	.89165	.88888	.88613	.88338
107	.91999	.91750	.91501	.91253	.91005	.90758	.90511	.90265	.90019	.89774
108	.93805	.93609	.93412	.93216	.93020	.92824	.92629	.92434	.92239	.92044
109	.96900	.96800	.96700	.96600	.96500	.96400	.96300	.96200	.96100	.96000
Age	8.2%	8.4%	8.6%	8.8%	9.0%	9.2%	9.4%	9.6%	9.8%	10.0%
0	.01709	.01658	.01612	.01570	.01532	.01497	.01466	.01437	.01410	.01386
1	.00892	.00839	.00791	.00747	.00708	.00672	.00639	.00609	.00582	.00557
2	.00896	.00840	.00790	.00744	.00702	.00664	.00629	.00598	.00569	.00542
3	.00926	.00867	.00814	.00765	.00721	.00681	.00644	.00611	.00580	.00552
4	.00970	.00908	.00851	.00800	.00753	.00711	.00672	.00636	.00604	.00574
5	.01026	.00960	.00900	.00846	.00796	.00751	.00710	.00672	.00637	.00606
6	.01089	.01019	.00956	.00899	.00846	.00799	.00755	.00715	.00678	.00644
7	.01161	.01088	.01021	.00960	.00905	.00854	.00808	.00765	.00726	.00690
8	.01241	.01163	.01093	.01029	.00970	.00917	.00867	.00822	.00781	.00743
9	.01331	.01249	.01175	.01107	.01045	.00988	.00936	.00889	.00845	.00804
10	.01432	.01346	.01268	.01196	.01131	.01071	.01016	.00965	.00918	.00875
11	.01543	.01453	.01370	.01295	.01226	.01162	.01104	.01051	.01001	.00956
13	.01664	.01569	.01482	.01403	.01330	.01263	.01202	.01145	.01093	
14	.01791 .01918	.01691 .01813	.01600 .01717	.01516 .01629	.01440 .01548	.01369 .01474	.01304 .01406	.01245 .01343	.01190	.01139 .01231
15	.02041	.01931	.01831	.01738	.01653	.01576	.01504	.01437	.01376	.01320
16	.02160	.02044	.01938	.01841	.01752	.01670	.01595	.01525	.01460	.01401
17	.02274	.02152	.02041	.01940	.01846	.01760	.01680	.01607	.01539	.01476
18	.02386	.02258	.02142	.02035	.01936	.01846	.01762	.01685	.01613	.01547
19	.02500	.02367	.02245	.02132	.02029	.01933	.01845	.01764	.01689	.01619
20	.02621	.02481	.02353	.02235	.02126	.02025	.01933	.01847	.01768	.01694
21	.02749	.02603	.02468	.02344	.02229	.02124	.02026	.01936	.01852	.01774
22	.02884	.02730	.02589	.02458	.02338	.02227	.02124	.02029	.01940	.01859
23	.03028	.02867	.02718	.02581	.02454	.02337	.02229	.02128	.02035	.01949
24	.03183	.03013	.02857	.02713	.02580	.02456	.02342	.02236	.02138	.02047
25	.03350	.03172	.03008	.02857	.02717	.02587	.02467	.02355	.02251	.02155
26	.03530	.03344	.03172	.03013	.02865	.02729	.02602	.02484	.02375	.02273
27	.03727	.03532	.03351	.03183	.03028	.02885	.02751	.02627	.02511	.02404
28	.03937	.03732	.03543	.03367	.03204	.03052	.02911	.02780	.02658	.02545
29	.04162	.03947	.03748	.03564	.03392	.03233	.03084	.02946	.02818	.02698
30	.04401	.04176	.03967	.03773	.03593	.03425	.03269	.03124	.02988	.02861
31	.04654	.04419	.04200 .04447	.03996	.03807	.03630	.03466	.03312	.03169	.03035
33	.04923	.04676	.04447	.04233	.04034 .04278	.03849	.03676	.03514	.03363 .03571	.03221
34	.05210 .05515	.04952 .05245	.04711	.04467	.04278	.04063	.03901 .04142	.03731	.03794	.03422
35	.05841	.05558	.05295	.05048	.04818	.04603	.04401	.03902	.04035	.03869
36	.06187	.05892	.05616	.05358	.05116	.04890	.04678	.04480	.04293	.04118
37	.06555	.06247	.05958	.05688	.05435	.05198	.04975	.04766	.04570	.04385
38	.06949	.06627	.06325	.06043	.05777	.05528	.05295	.05075	.04868	.04674
39	.07368	.07032	.06717	.06421	.06143	.05882	.05637	.05406	.05189	.04984
40	.07816	.07465	.07137	.06827	.06537	.06263	.06006	.05764	.05535	.05320
41	.08295	.07930	.07587	.07264	.06960	.06674	.06405	.06150	.05910	.05683
42	.08807	.08427	.08069	.07733	.07415	.07116	.06833	.06567	.06315	.06077
43	.09352	.08957	.08585	.08233	.07902	.07589	.07294	.07014	.06750	.06500
44	.09932	.09521	.09134	.08768	.08423	.08096	.07787	.07495	.07218	.06956
45	.10543	.10117	.09715	.09334	.08974	.08634	.08311	.08005	.07716	.07441
46	.11189	.10747	.10329	.09933	.09559	.09204	.08867	.08548	.08245	.07958
47	.11866	.11408	.10974	.10564	.10174	.09805	.09454	.09121	.08805	.08504
48	.12577	.12103	.11654	.11228	.10823	.10439	.10074	.09727	.09397	.09083

Age	8.2%	8.4%	8.6%	8.8%	9.0%	9.2%	9.4%	9.6%	9.8%	10.0%
49	.13323	.12833	.12368	.11926	.11506	.11107	.10728	.10366	.10022	.09695
50	.14107	.13601	.13120	.12663	.12228	.11813	.11419	.11043	.10685	.10344
51	.14928	.14407	.13910	.13437	.12987	.12558	.12149	.11758	.11386	.11031
52	.15785	.15248	.14735	.14247	.13781	.13337	.12913	.12508	.12122	.11752
53	.16678	.16124	.15597	.15093	.14612	.14153	.13714	.13294	.12893	.12509
54	.17606	.17037	.16493	.15974	.15478	.15004	.14550	.14116	.13700	.13302
55	.18570	.17986	.17428	.16893	.16382	.15893	.15424	.14976	.14546	.14134
56	.19573	.18974	.18400	.17851	.17325	.16821	.16338	.15875	.15430	.15004
57	.20613	.20000	.19412	.18848	.18307	.17789	.17291	.16814	.16355	.15914
58 59	.21688 .22793	.21060 .22151	.20458 .21535	.19880 .20943	.19325 .20374	.18792 .19827	.18280 .19301	.17788 .18795	.17316 .18309	.16861 .17840
60	.23927	.23272	.22642	.22036	.21454	.20893	.20354	.19834	.19334	.18851
61	.25092	.24425	.23782	.23163	.22567	.21993	.21440	.20907	.20393	.19898
62	.26295	.25616	.24961	.24329	.23721	.23134	.22568	.22021	.21494	.20985
63	.27538	.26847	.26180	.25537	.24916	.24316	.23738	.23179	.22639	.22117
64	.28817	.28116	.27438	.26783	.26150	.25539	.24949	.24377	.23825	.23291
65	.30134	.29423	.28735	.28069	.27426	.26803	.26201	.25618	.25054	.24508
66	.31493	.30772	.30075	.29399	.28746	.28113	.27500	.26906	.26331	.25774
67	.32899	.32170	.31464	.30780	.30118	.29475	.28852	.28248	.27663	.27095
68	.34349 .35841	.33614	.32901	.32209	.31538	.30887	.30256	.29643	.29047	.28469 .29894
69 70	.37366	.35100 .36620	.34381	.33683 .35193	.33005 .34509	.32346	.31707 .33197	.31085 .32568	.30481 .31957	.31362
71	.38916	.38167	.37440	.36732	.36043	.35372	.34720	.34084	.33466	.32864
72	.40486	.39736	.39006	.38295	.37602	.36927	.36270	.35629	.35005	.34396
73	.42074	.41323	.40591	.39878	.39182	.38504	.37843	.37198	.36568	.35955
74	.43685	.42934	.42202	.41488	.40791	.40110	.39446	.38798	.38165	.37547
75	.45326	.44577	.43846	.43132	.42435	.41754	.41088	.40438	.39802	.39181
76	.47004	.46259	.45530	.44818	.44122	.43442	.42776	.42125	.41488	.40865
77	.48718	.47979	.47255	.46547	.45853	.45175	.44511	.43861	.43225	.42601
78	.50467	.49735	.49017	.48314	.47626	.46951	.46290	.45643	.45008	.44386
79	.52239 .54018	.51515	.50806	.50110	.49427 .51242	.48758	.48102	.47459	.46828	.46209 .48052
80 81	.55788	.53304 .55085	.52603 .54396	.51916 .53718	.53053	.50580 .52399	.49930 .51757	.49292 .51126	.48666 .50507	.49898
82	.57540	.56851	.56173	.55506	.54851	.54207	.53574	.52951	.52339	.51737
83	.59274	.58598	.57933	.57279	.56635	.56001	.55378	.54765	.54161	.53567
84	.61002	.60341	.59690	.59049	.58418	.57796	.57184	.56582	.55988	.55403
85	.62734	.62090	.61454	.60828	.60211	.59603	.59004	.58414	.57832	.57258
86	.64455	.63828	.63210	.62600	.61999	.61406	.60821	.60244	.59675	.59113
87	.66139	.65531	.64930	.64337	.63752	.63175	.62605	.62043	.61488	.60939
88	.67783	.67194	.66612	.66037	.65469	.64908	.64354	.63807	.63267	.62733
89 90	.69387 .70947	.68817 .70398	.68254	.67698 .69318	.67148 .68786	.66605	.66068 .67742	.65537 .67228	.65012	.64493 .66217
91	.72437	.71908	.69855 .71385	.70867	.70354	.68261 .69847	.69345	.68848	.66719 .68357	.67870
92	.73823	.73314	.72810	.72310	.71816	.71326	.70841	.70361	.69886	.69415
93	.75109	.74618	.74132	.73650	.73173	.72700	.72232	.71768	.71308	.70852
94	.76312	.75839	.75370	.74905	.74445	.73988	.73536	.73087	.72643	.72202
95	.77459	.77004	.76552	.76104	.75660	.75220	.74783	.74350	.73920	.73494
96	.78543	.78105	.77670	.77238	.76810	.76386	.75964	.75546	.75131	.74720
97	.79550	.79128	.78709	.78293	.77880	.77470	.77063	.76659	.76258	.75860
98	.80498	.80091	.79687	.79286	.78888	.78492	.78099	.77709	.77322	.76937
99 100	.81428 .82336	.81036 .81959	.80647 .81586	.80261 .81214	.79877 .80845	.79496 .80478	.79117 .80113	.78741 .79751	.78367 .79390	.77995 .79032
101	.83234	.82873	.82515	.82158	.81804	.81451	.81101	.80753	.80406	.80062
102	.84119	.83774	.83431	.83089	.82750	.82412	.82076	.81742	.81409	.81078
103	.84999	.84670	.84342	.84016	.83691	.83368	.83046	.82726	.82408	.82091
104	.85944	.85632	.85321	.85011	.84703	.84396	.84090	.83786	.83483	.83182
105	.86866	.86570	.86276	.85982	.85690	.85399	.85109	.84820	.84532	.84245
106	.88065	.87792	.87520	.87248	.86978	.86708	.86440	.86172	.85905	.85638
107	.89530	.89286	.89042	.88799	.88557	.88315	.88073	.87833	.87592	.87352
108	.91849	.91654	.91460 .95700	.91266 .95600	.91072 .95500	.90879 .95400	.90685	.90492 .95200	.90299 .95100	.90106 .95000
109	1 .93900	.95800	.93700	.93000	.95500	.93400	.95300	.93200	.951001	.93000
Age	10.2%	10.4%	10.6%	10.8%	11.0%	11.2%	11.4%	11.6%	11.8%	12.0%
0	.01363	.01342	.01323	.01305	.01288	.01272	.01258	.01244	.01231	.01219
1	.00534	.00512	.00493	.00474	.00458	.00442	.00427	.00414	.00401	.00389
2	.00518	.00495	.00474	.00455	.00437	.00421	.00405	.00391	.00377	.00365
3	.00526	.00502	.00480	.00459	.00440	.00422	.00406	.00391	.00376	.00363
4	.00546	.00521	.00497	.00475	.00455	.00436	.00419	.00402	.00387	.00373
5	.00576	.00549	.00524	.00501	.00479	.00459	.00440	.00423	.00406	.00391
6	.00613	.00584	.00557	.00532	.00509	.00488	.00468	.00449	.00432	.00415
7 8	.00657	.00626 .00675	.00598 .00644	.00571 .00616	.00547 .00590	.00524 .00565	.00502 .00542	.00482 .00521	.00464 .00501	.00446 .00482
9	.00767		.00644	.00669	.00590		.00542		.00547	
-			.55555						.555	

_	Age	10.2%	10.4%	10.6%	10.8%	11.0%	11.2%	11.4%	11.6%	11.8%	12.0%
10		.00835	.00798	.00764	.00732	.00702	.00675	.00649	.00624	.00602	.00580
		.00913	.00874	.00838	.00804	.00772	.00743	.00715	.00689	.00665	.00642
		.01000	.00959	.00920	.00884	.00851	.00819	.00790	.00762	.00737	.00712
		.01091	.01048	.01007	.00969	.00933	.00900	.00869	.00840	.00813	.00787
		.01181 .01267	.01135 .01218	.01092 .01173	.01052 .01130	.01014 .01091	.00979 .01054	.00947 .01019	.00916	.00887 .00956	.00860
		.01345	.01210	.01246	.01201	.01160	.01121	.01013	.01050	.01018	.00988
		.01418	.01364	.01313	.01266	.01222	.01181	.01143	.01107	.01073	.01041
18		.01486	.01429	.01375	.01326	.01279	.01236	.01196	.01158	.01122	.01088
		.01554	.01494	.01438	.01385	.01336	.01291	.01248	.01208	.01170	.01135
		.01626	.01562	.01503	.01448	.01396	.01348	.01303	.01260	.01220	.01183
		.01702 .01782	.01635 .01711	.01573 .01645	.01514 .01584	.01460 .01526	.01409	.01361 .01422	.01374	.01274 .01330	.01235 .01288
		.01868	.01793	.01724	.01658	.01597	.01540	.01487	.01437	.01390	.01345
		.01962	.01883	.01809	.01740	.01675	.01615	.01558	.01505	.01455	.01408
		.02065	.01981	.01903	.01830	.01762	.01698	.01638	.01581	.01528	.01478
		.02178	.02089	.02006	.01929	.01856	.01789	.01725	.01665	.01609	.01556
		.02303	.02209	.02122	.02040	.01963	.01891	.01824	.01760	.01700	.01644
		.02439 .02585	.02339 .02480	.02247 .02382	.02160 .02290	.02079 .02204	.02002 .02123	.01931	.01863 .01976	.01800	.01740 .01845
		.02742	.02631	.02527	.02430	.02339	.02253	.02172	.02096	.02025	.01957
		.02910	.02793	.02683	.02579	.02482	.02391	.02306	.02225	.02149	.02077
		.03089	.02965	.02849	.02739	.02636	.02540	.02449	.02363	.02282	.02206
		.03282	.03151	.03028	.02912	.02803	.02701	.02604	.02513	.02427	.02346
		.03489	.03350	.03220	.03097	.02982	.02873	.02771	.02674	.02583	.02497
		.03713	.03567	.03429	.03299	.03177	.03061	.02953	.02850	.02753 .02936	.02661 .02838
		.04211	.04048	.03894	.03748	.03611	.03481	.03359	.03243	.03134	.03030
		.04490	.04318	.04155	.04001	.03856	.03719	.03589	.03466	.03350	.03239
39		.04791	.04609	.04437	.04274	.04120	.03975	.03837	.03707	.03583	.03466
		.05116	.04924	.04742	.04571	.04408	.04254	.04108	.03970	.03839	.03714
		.05469	.05267	.05075	.04894	.04722	.04559	.04405	.04258	.04119	.03987
		.05851	.05638	.05436	.05245	.05063	.04891	.04728	.04573	.04425	.04285
		.06263 .06707	.06039 .06472	.05827 .06248	.05625 .06035	.05433 .05834	.05252 .05642	.05079 .05459	.04915 .05286	.04759 .05121	.04963
		.07180	.06933	.06698	.06474	.06262	.06059	.05867	.05684	.05509	.05342
		.07685	.07425	.07178	.06943	.06720	.06507	.06304	.06110	.05926	.05750
47		.08218	.07946	.07687	.07440	.07205	.06981	.06768	.06564	.06369	.06183
		.08784	.08499	.08228	.07969	.07722	.07487	.07262	.07047	.06842	.06646
		.09382	.09085	.08801	.08530	.08271	.08024	.07788	.07562	.07346	.07140
		.10018	.09707	.09410 .10057	.09127 .09761	.08856 .09477	.08597 .09206	.08349 .08946	.08112 .08697	.07885 .08459	.07667
		.11399	.11061	.10037	.10429	.10132	.09200	.09577	.09316	.09066	.08826
		.12142	.11791	.11454	.11132	.10823	.10526	.10242	.09969	.09707	.09456
54		.12921	.12556	.12206	.11870	.11548	.11239	.10942	.10657	.10383	.10120
		.13738	.13359	.12995	.12646	.12311	.11989	.11679	.11382	.11096	.10820
		.14595	.14202	.13824	.13462	.13113	.12778	.12456	.12146	.11847	.11560
		.15491 .16424	.15084 .16004	.14693 .15599	.14317 .15209	.13955 .14834	.13607 .14473	.13272 .14125	.12949 .13789	.12638 .13465	.12338
		.17390	.16955	.16537	.16134	.15746	.15371	.15010	.14662	.14325	.14001
		.18387	.17939	.17507	.17091	.16689	.16302	.15927	.15566	.15217	.14880
		.19420	.18958	.18513	.18084	.17669	.17268	.16881	.16506	.16145	.15795
		.20494	.20020	.19561	.19119	.18691	.18277	.17877	.17490	.17115	.16753
		.21613	.21126	.20654	.20199	.19758	.19331	.18918	.18518	.18131	.17757
		.22774	.22274	.21791	.21322	.20869	.20429	.20004	.19592	.19192	.18805
		.25233	.24709	.22971 .24202	.23709	.22025 .23231	.21573 .22767	.21135 .22318	.20710 .21881	.20299 .21457	.21045
		.26543	.26009	.25489	.24985	.24496	.24021	.23560	.23111	.22676	.22252
		.27908	.27363	.26833	.26319	.25819	.25332	.24860	.24400	.23954	.23519
69		.29324	.28769	.28230	.27705	.27195	.26699	.26216	.25746	.25288	.24843
70		.30783	.30219	.29671	.29137	.28618	.28112	.27619	.27139	.26672	.26216
		.32277	.31706	.31150	.30608	.30079	.29564	.29063	.28573	.28096	.27631
		.33803 .35356	.33225 .34772	.32661 .34201	.32112 .33645	.31575 .33101	.31052 .32571	.30542 .32053	.30044	.29559 .31053	.29084 .30571
		.36943	.36354	.35778	.35215	.34666	.34129	.33604	.33091	.32590	.32100
		.38574	.37980	.37400	.36833	.36278	.35735	.35205	.34686	.34178	.33681
		.40256	.39660	.39076	.38505	.37947	.37400	.36864	.36340	.35827	.35324
		.41991	.41394	.40808	.40235	.39674	.39124	.38585	.38056	.37539	.37032
		.43777	.43180	.42594	.42020	.41457	.40906	.40365	.39834	.39314	.38803
		.45602	.45007	.44422	.43849	.43287	.42735	.42193	.41661	.41139	.40627
		.47449 .49300	.46856 .48712	.46275 .48134	.45704 .47566	.45143 .47008	.44592 .46460	.44051 .45921	.43519 .45391	.42997 .44870	.42484 .44357
		.51145	.50563	.49990	.49427	.48873	.48328	.47792	.47265	.46746	.46235
		.52983	.52407					.49663	.49139		

		,	,						•	
Age	10.2%	10.4%	10.6%	10.8%	11.0%	11.2%	11.4%	11.6%	11.8%	12.0%
84	.54828	.54261	.53702	.53151	.52609	.52075	.51549	.51030	.50519	.50015
85	.56693	.56135	.55586	.55044	.54510	.53983	.53464	.52952	.52447	.51949
86	.58560	.58013	.57474	.56943	.56418	.55901	.55390	.54886	.54389	.53898
87	.60398	.59864	.59337	.58817	.58303	.57795	.57294	.56799	.56310	.55828
88	.62206	.61685	.61170	.60662	.60159	.59663	.59173	.58688	.58209	.57736
89	.63980	.63474	.62972	.62477	.61987	.61503	.61024	.60551	.60083	.59620
90	.65719	.65227	.64741	.64259	.63783	.63312	.62846	.62385	.61928	.61477
91	.67388	.66912	.66440	.65973	.65511	.65053	.64600	.64152	.63708	.63269
92	.68949 .70401	.68487 .69954	.68030 .69511	.67577 .69072	.67129 .68637	.66685 .68205	.66245	.65809 .67355	.65378 .66935	.64950 .66519
93 94	.71765	.71332	.70902	.70477	.70055	.69636	.67778 .69222	.68810	.68403	.67998
95	.73072	.72653	.72237	.71825	.71416	.71010	.70608	.70209	.69813	.69421
96	.74311	.73906	.73504	.73105	.72709	.72316	.71926	.71539	.71155	.70774
97	.75465	.75073	.74684	.74297	.73914	.73533	.73155	.72780	.72407	.72037
98	.76555	.76175	.75798	.75424	.75052	.74683	.74317	.73953	.73591	.73232
99	.77626	.77260	.76895	.76534	.76174	.75817	.75462	.75109	.74759	.74411
100	.78676	.78323	.77971	.77622	.77274	.76929	.76586	.76245	.75906	.75569
101	.79719	.79379	.79040	.78703	.78368	.78035	.77704	.77375	.77048	.76722
102	.80749	.80422	.80096	.79772	.79450	.79130	.78811	.78494	.78178	.77864
103	.81775	.81461	.81149	.80838	.80529	.80221	.79914	.79609	.79306	.79003
104	.82881	.82582	.82284	.81988	.81693	.81399	.81106	.80815	.80525	.80236
105	.83959	.83674	.83391	.83108	.82826	.82546	.82267	.81988	.81711	.81435
106	.85373	.85108	.84844	.84581	.84319	.84058	.83797	.83537	.83278	.83020
107	.87113	.86875 .89721	.86636 .89529	.86399 .89337	.86161 .89145	.85925 .88953	.85689 .88762	.85453 .88571	.85218 .88380	.84984 .88189
109	.94900	.94800	.94700	.94600	.94500	.94400	.94300	.94200	.94100	.94000
	.0.000	.0.000		10 1000	.0.000	.01.00	.0.000	10 1200	.000	.0.000
Age	12.2%	12.4%	12.6%	12.8%	13.0%	13.2%	13.4%	13.6%	13.8%	14.0%
0	.01208	.01197	.01187	.01177	.01168	.01159	.01151	.01143	.01135	.01128
1	.00378	.00367	.00358	.00348	.00340	.00331	.00323	.00316	.00309	.00302
2	.00353	.00342	.00331	.00322	.00312	.00304	.00295	.00288	.00280	.00273
3	.00350	.00339	.00327	.00317	.00307	.00298	.00289	.00281	.00273	.00265
4	.00359	.00347	.00335	.00324	.00313	.00303	.00294	.00285	.00276	.00268
5	.00377	.00363	.00351	.00339	.00327	.00317	.00306	.00297	.00288	.00279
6	.00400	.00386	.00372	.00359	.00347	.00335	.00325	.00314	.00305	.00295
7	.00430	.00414	.00400	.00386	.00373	.00360	.00349	.00338	.00327	.00317
8 9	.00465	.00448	.00432 .00473	.00417 .00457	.00403	.00390	.00378 .00414	.00366	.00354	.00344
10	.00560	.00490	.00523	.00506	.00442	.00426	.00414	.00402	.00389	.00376
11	.00620	.00600	.00581	.00563	.00546	.00529	.00514	.00499	.00485	.00472
12	.00689	.00668	.00647	.00628	.00610	.00593	.00576	.00560	.00545	.00531
13	.00763	.00740	.00718	.00698	.00678	.00660	.00642	.00626	.00610	.00595
14	.00834	.00810	.00787	.00766	.00745	.00726	.00707	.00689	.00673	.00657
15	.00901	.00875	.00851	.00828	.00807	.00786	.00767	.00748	.00730	.00714
16	.00959	.00932	.00907	.00883	.00860	.00839	.00818	.00799	.00780	.00762
17	.01011	.00983	.00956	.00930	.00907	.00884	.00862	.00842	.00822	.00804
18	.01057	.01027	.00999	.00972	.00947	.00923	.00900	.00879	.00858	.00839
19	.01101	.01070	.01040	.01012	.00985	.00960	.00936	.00914	.00892	.00871
20	.01148	.01115	.01083	.01054	.01026	.00999	.00974	.00950	.00927	.00905
21	.01197 .01249	.01162	.01129 .01176	.01098	.01068 .01112	.01040 .01082	.01014 .01054	.00988	.00964 .01002	.00941 .00978
23	.01304	.01211	.01170	.01192	.01159	.01002	.01034	.01027	.01042	.01017
24	.01364	.01204	.01227	.01192	.01210	.01177	.01096	.01115	.01042	.01017
25	.01431	.01387	.01345	.01306	.01268	.01233	.01199	.01168	.01137	.01109
26	.01506	.01459	.01415	.01373	.01333	.01295	.01260	.01226	.01194	.01163
27	.01591	.01541	.01494	.01449	.01407	.01367	.01329	.01293	.01259	.01226
28	.01684	.01631	.01580	.01533	.01488	.01445	.01405	.01367	.01330	.01296
29	.01785	.01728	.01675	.01624	.01577	.01531	.01488	.01447	.01408	.01372
30	.01893	.01833	.01776	.01723	.01672	.01623	.01578	.01534	.01493	.01453
31	.02010	.01946	.01885	.01828	.01773	.01722	.01673	.01627	.01582	.01540
32	.02134	.02066	.02002	.01940	.01883	.01828	.01776	.01726	.01679	.01634
33	.02270	.02197	.02128	.02063	.02002	.01943	.01887	.01835	.01784	.01736
34 35	.02415	.02338	.02265	.02195	.02130	.02067	.02008	.01951	.01897	.01846
36	.02574	.02492	.02414 .02575	.02340	.02270 .02422	.02203	.02140 .02283	.02080 .02218	.02022 .02157	.01967
37	.02746	.02838	.02575	.02496	.02422	.02350	.02438	.02218	.02303	.02098
38	.02932	.03035	.02730	.02851	.02766	.02685	.02608	.02534	.02363	.02397
39	.03355	.03249	.03149	.03053	.02962	.02876	.02793	.02715	.02640	.02568
40	.03596	.03484	.03377	.03275	.03178	.03086	.02998	.02914	.02833	.02757
41	.03861	.03742	.03628	.03520	.03416	.03318	.03224	.03134	.03048	.02966
42	.04152	.04025	.03903	.03788	.03678	.03573	.03473	.03377	.03285	.03198
43	.04468	.04333	.04205	.04082	.03965	.03853	.03746	.03644	.03546	.03453
44	.04813	.04670	.04533	.04403	.04278	.04159	.04045	.03936	.03832	.03732

26 CFR Ch. I (4-1-08 Edition)

§ 1.664-4

_											
	Age	12.2%	12.4%	12.6%	12.8%	13.0%	13.2%	13.4%	13.6%	13.8%	14.0%
45		.05183	.05032	.04887	.04748	.04616	.04489	.04368	.04252	.04141	.04034
		.05582	.05421	.05267	.05121	.04980	.04846	.04717	.04593	.04475	.04362
		.06006	.05836	.05673	.05518	.05369	.05226	.05089	.04958	.04832	.04711
		.06459	.06279	.06107	.05943	.05785	.05634	.05488	.05349	.05216	.05087
		.06942	.06752	.06571	.06397	.06230	.06070	.05916	.05768	.05626	.05490
		.07459 .08012	.07259 .07801	.07068 .07599	.06884 .07406	.06708 .07220	.06538 .07041	.06376 .06869	.06219 .06703	.06069 .06544	.05924 .06391
		.08596	.08375	.08163	.07959	.07763	.07574	.07392	.07218	.07049	.06887
		.09214	.08982	.08759	.08544	.08338	.08139	.07948	.07763	.07586	.07415
		.09867	.09623	.09389	.09164	.08946	.08737	.08536	.08342	.08154	.07974
55		.10556	.10301	.10055	.09819	.09591	.09371	.09159	.08955	.08757	.08567
		.11283	.11016	.10759	.10511	.10272	.10042	.09819	.09605	.09397	.09197
		.12050	.11771	.11502	.11243	.10993	.10751	.10518	.10293	.10075	.09864
		.12852	.12562	.12281	.12011	.11749	.11496	.11252	.11016	.10787	.10567
		.13687 .14554	.13385 .14240	.13092 .13935	.12810 .13641	.12537 .13356	.12273 .13080	.12017 .12813	.11770 .12555	.11531 .12305	.11299 .12063
		.15457	.15130	.14813	.14507	.14210	.13923	.13644	.13375	.13113	.12860
		.16402	.16063	.15734	.15415	.15107	.14808	.14518	.14237	.13964	.13699
		.17393	.17042	.16700	.16370	.16049	.15738	.15437	.15144	.14860	.14584
		.18429	.18065	.17712	.17369	.17036	.16714	.16400	.16096	.15800	.15513
		.19511	.19135	.18769	.18415	.18070	.17735	.17410	.17094	.16787	.16488
		.20645	.20257	.19880	.19513	.19157	.18810	.18473	.18146	.17827	.17517
		.21841	.21441	.21052	.20673	.20305	.19947	.19599	.19259	.18929	.18608
		.23096 .24409	.22685 .23987	.22284 .23575	.21895 .23175	.21515 .22784	.21146 .22404	.20786 .22033	.20436 .21672	.20094 .21320	.19762
		.25772	.25339	.23373	.24507	.24106	.23715	.23333	.22961	.21520	.20976
		.27178	.26735	.26304	.25882	.25471	.25070	.24679	.24296	.23923	.23559
		.28622	.28170	.27729	.27298	.26877	.26467	.26065	.25673	.25290	.24915
		.30100	.29639	.29189	.28749	.28320	.27899	.27489	.27087	.26694	.26310
		.31621	.31152	.30694	.30246	.29807	.29378	.28959	.28548	.28146	.27753
		.33195	.32719	.32253	.31797	.31351	.30914	.30486	.30067	.29657	.29255
		.34832	.34350	.33877	.33415	.32961	.32517	.32082	.31656	.31238	.30828
		.36535 .38302	.36047 .37811	.35570 .37329	.35101 .36856	.34642 .36392	.34192 .35937	.33750 .35490	.33317 .35051	.32892 .34621	.32475 .34198
		.40124	.39630	.39145	.38669	.38201	.37742	.37291	.36848	.36413	.35985
		.41980	.41485	.40998	.40520	.40050	.39588	.39134	.38688	.38249	.37818
		.43854	.43358	.42871	.42392	.41921	.41457	.41001	.40553	.40112	.39678
		.45733	.45238	.44752	.44273	.43802	.43338	.42881	.42431	.41989	.41553
		.47616	.47123	.46638	.46161	.45690	.45227	.44770	.44320	.43877	.43441
		.49519 .51458	.49030	.48548	.48073	.47604	.47143	.46688	.46239	.45797	.45361
		.53413	.50974 .52935	.50496 .52463	.50025 .51998	.49560 .51538	.49102 .51084	.48650 .50636	.48204 .50194	.47763 .49758	.47329 .49327
		.55351	.54881	.54416	.53957	.53503	.53055	.52613	.52176	.51744	.51317
		.57268	.56806	.56349	.55898	.55451	.55010	.54574	.54144	.53718	.53296
		.59162	.58710	.58262	.57819	.57382	.56949	.56520	.56097	.55678	.55263
		.61030	.60588	.60151	.59718	.59290	.58866	.58447	.58032	.57621	.57214
		.62834	.62403	.61977	.61554	.61136	.60722	.60312	.59907	.59505	.59107
		.64527 .66107	.64107 .65699	.63692 .65294	.63280 .64893	.62872 .64495	.62468 .64101	.62068 .63711	.61672 .63323	.61279 .62940	.60890 .62559
		.67597	.67200	.66806	.66415	.66027	.65643	.65262	.64884	.64509	.64138
		.69031	.68645	.68262	.67881	.67504	.67130	.66759	.66390	.66025	.65662
		.70396	.70021	.69648	.69279	.68912	.68548	.68186	.67828	.67471	.67118
		.71670	.71305	.70943	.70584	.70227	.69872	.69520	.69171	.68824	.68480
		.72875	.72521	.72169	.71819	.71472	.71127	.70784	.70444	.70106	.69770
		.74065	.73721	.73379	.73040	.72703	.72368	.72035	.71704	.71375	.71048
)	.75234 .76399	.74901 .76077	.74570 .75757	.74241 .75438	.73914 .75122	.73589 .74807	.73265 .74494	.72944 .74183	.72625 .73873	.72307 .73565
	2	.76399	.76077	.76932	.75438	.75122	.74807	.74494	.74183	.73873	.74813
	3	.78703	.78404	.78106	.77809	.77514	.77221	.76929	.76638	.76348	.76060
		.79948	.79662	.79377	.79093	.78810	.78528	.78248	.77969	.77691	.77414
	i	.81159	.80885	.80612	.80340	.80069	.79799	.79530	.79262	.78995	.78729
	3	.82763	.82506	.82250	.81995	.81741	.81488	.81235	.80983	.80732	.80482
	,	.84749	.84516	.84283	.84051	.83819	.83587	.83356	.83126	.82896	.82666
	3	.87999	.87808	.87618	.87428	.87238	.87049	.86859	.86670	.86481	.86293
108)	.93900	.93800	.93700	.93600	.93500	.93400	.93300	.93200	.93100	.93000

(f) Effective dates. This section applies after April 30, 1999.

[T.D. 8540, 59 FR 30117, June 10, 1994, as amended by T.D. 8819, 64 FR 23199, Apr. 30, 1999; T.D. 8886, 65 FR 36919, 36943, June 12, 2000]

TREATMENT OF EXCESS DISTRIBUTIONS OF TRUSTS APPLICABLE TO TAXABLE YEARS BEGINNING BEFORE JANUARY 1, 1969

§ 1.665(a)-0 Excess distributions by trusts; scope of subpart D.

Subpart D (section 665 and following), part I, subchapter J, chapter 1 of the Internal Revenue Code, in the case of trusts other than foreign trusts created by U.S. persons, is designed generally to prevent a shift of tax burden to a trust from a beneficiary or beneficiaries. In the case of a foreign trust created by a U.S. person, subpart D is designed to prevent certain other tax avoidance possibilities. To accomplish these ends, subpart D provides special rules for treatment of amounts paid, credited, or required to be distributed by a complex trust (subject to subpart C (section 661 and following) of such part I) in any year in excess of distributable net income for that year. Such an excess distribution is defined as an accumulation distribution, subject to the limitations in section 665 (b) or (c). An accumulation distribution, in the case of a trust other than a foreign trust created by a U.S. person, is "thrown back" to each of the 5 preceding years in inverse order. In the case of a foreign trust created by a U.S. person such an accumulation distribution is "thrown back," in inverse order, to each of the preceding years to which the Internal Revenue Code of 1954 applies. That is, an accumulation distribution will be taxed to the beneficiaries of the trust in the year the distribution is made or required, but, in general, only to the extent of the distributable net income of those years which was not in fact distributed. However, with respect to a distribution by a trust other than a foreign trust created by a U.S. person, the resulting tax will not be greater than the aggregate of the taxes that would have been attributable to the amount thrown back to previous years had they been included in gross income of the beneficiaries in those years. In the case of a foreign trust created by a U.S. person, the resulting tax is computed under the provisions of section 669. To prevent double taxation, both in the case of a foreign trust created by a U.S. person, and a trust other than a foreign trust created by a U.S. person, the beneficiaries receive a credit for any taxes previously paid by the trust which are attributable to the excess thrown back and which are creditable under the provisions of chapter 1 of the Internal Revenue Code. Subpart D does not apply to any estate.

[T.D. 6989, 34 FR 733, Jan. 17, 1969]

§ 1.665(a)-1 Undistributed net income.

- (a) The term *undistributed net income* means for any taxable year the distributable net income of the trust for that year as determined under section 643(a), less:
- (1) The amount of income required to be distributed currently and any other amounts properly paid or credited or required to be distributed to beneficiaries in the taxable year as specified in paragraphs (1) and (2) of section 661(a), and
- (2) The amount of taxes imposed on the trust, as defined in §1.665(d)-1.

The application of the rule in this paragraph to the first year of a trust in which income is accumulated may be illustrated by the following example:

Example. Assume that under the terms of the trust, \$10,000 of income is required to be distributed currently to A and the trustee has discretion to make additional distributions to A. During the taxable year 1954 the trust had distributable net income of \$30,100 derived from royalties and the trustee made distributions of \$20,000 to A. The taxable income of the trust is \$10,000 on which a tax of \$2,640 is paid. The undistributed net income of the trust as of the close of the taxable year 1954 is \$7,460 computed as follows:

\$30,100
00.040
22,640
7 460